

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

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BOZA PLEASANT-BEY,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 3:19-cv-00486
	)	
	)	
STATE OF TENNESSEE, ET AL,	)	
	)	
Defendants.	)	

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The Deposition of:      TONY PARKER  
                                 April 21, 2021

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1           The deposition of TONY PARKER was taken by  
2 counsel for the Plaintiff, by notice, via Zoom, on  
3 April 21, 2020, pursuant to the provisions of the  
4 Federal Rules of Civil Procedure.

5           All formalities as to notice, caption,  
6 certificate, reading and signing of the deposition  
7 are waived. All objections, except as to the form of  
8 the questions, are reserved to the hearing.  
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1 THE COURT REPORTER: Good morning. We are  
2 on the record. Today is April 21, 2021 at 10:03  
3 a.m. At this time I would ask counsel to please  
4 introduce yourself, who you represent, and that you  
5 agree to take this deposition via Zoom. We will  
6 start with Ms. Herzfeld.

7 MS. HERZFELD: Tricia Herzfeld and Janna  
8 Maples representing the plaintiff, and we consent to  
9 take this deposition via Zoom.

10 MR. AUMANN: Good morning. This is Tom  
11 Aumann, and I represent the Tennessee Department of  
12 Correction, the defendants in this case, and we  
13 consent to take the deposition via Zoom.

14 MR. WELBORN: Joe Welborn and Erin Polly,  
15 we represent CoreCivic and we consent.

16 TONY PARKER,  
17 having been first duly sworn, testified as follows:  
18 EXAMINATION BY MS. HERZFELD:

19 Q. Sir, could you state your name and spell  
20 it for the record, please?

21 A. Yes. My name is Tony Parker, T-O-N-Y,  
22 P-A-R-K-E-R.

23 Q. What is your position?

24 A. I'm the commissioner of the Department of  
25 Corrections.

1 Q. Have you ever given a deposition before?

2 A. I have.

3 Q. How many times?

4 A. I don't know the exact number of times.

5 Probably ten or more.

6 Q. How long have you been commissioner of the  
7 Department of Corrections?

8 A. Since 2016, June of 2016.

9 Q. When you gave those depositions before,  
10 were you given the rules, that you need to say yes  
11 and not shake your head, you know, uh-huh or huh-uh,  
12 do you remember all those rules?

13 A. I do remember those rules. I sometimes  
14 have a hard -- trouble remembering and following  
15 them, but, yes, I do remember those.

16 Q. I'll try to remind you so you don't  
17 forget, how does that sound?

18 A. Thank you.

19 Q. Okay. Great. And if you need to take a  
20 break at any point, just let me know. Are you in  
21 your office today?

22 A. I am.

23 Q. Okay. Great. Do you have anybody else  
24 around you as you're taking this deposition, or are  
25 you alone in your office?

1           A.     I'm alone in my office.

2           Q.     Okay. Great. Have you given a deposition  
3 via Zoom before?

4           A.     I have.

5           Q.     Great. So you've been giving depositions  
6 through the pandemic. How many Zoom depositions  
7 have you given?

8           A.     I think one or two via Zoom. The last one  
9 was, I don't know, a few months ago.

10          Q.     Okay. And what type of case was it?

11          A.     It was a case involving an inmate at  
12 Riverbend, a death row inmate.

13          Q.     Okay. Have you ever given a deposition  
14 regarding Trousdale?

15          A.     Not that I remember.

16          Q.     What did you do to prepare for your  
17 deposition today?

18          A.     I talked to my counsel and I've briefly  
19 looked over some -- the complaint as well as some of  
20 the policies that apply.

21          Q.     Okay. And who is your counsel?

22          A.     Mr. Aumann with the AG's office.

23          Q.     Okay. And when did you meet with  
24 Mr. Aumann?

25          A.     Couple days ago, I believe.

1 Q. And how long did you meet with him?

2 A. Approximately 30 to 40 minutes.

3 Q. Did you do that over the phone or in  
4 person or Zoom?

5 A. Zoom, Webex, Zoom.

6 Q. Whatever it is, Teams, Zoom, Webex, one of  
7 those things. And was there anybody else present  
8 during that meeting?

9 A. There was another attorney, but I don't  
10 remember the lady's name.

11 Q. Was your understanding that she was also  
12 with the Attorney General's Office?

13 A. Yes.

14 Q. In preparation for your deposition today,  
15 did you speak with any lawyers from CoreCivic?

16 A. No.

17 Q. When you said you looked over some  
18 policies, do you recall which policies you looked  
19 over?

20 A. It related to religious services.  
21 Primarily religious service-related policies.

22 Q. Okay. And did you look over any policies  
23 that did not have to do with religious services?

24 A. I looked over some documentation relating  
25 to the compliance, our compliance division. I



1 reviewed our organizational structure for the  
2 Department, general information such as that.

3 Q. Okay. Did you choose the documents that  
4 you looked at or did your counsel choose those?

5 A. I'm sorry?

6 Q. The documents that you reviewed, did  
7 somebody choose those for you to review or did you  
8 just kind of look at stuff on your own?

9 A. I think the attorneys sent me some  
10 information that I looked at, but I also looked at  
11 others on my own, too.

12 Q. Okay. And you said you've been  
13 commissioner since June of 2016?

14 A. That's correct.

15 Q. And before that, what was your position?

16 A. I was assistant commissioner of prisons  
17 for the State of Tennessee.

18 Q. And you did that for about what, a little  
19 under nine years?

20 A. Yeah. Well, I think it was more like five  
21 or six years.

22 Q. Okay. And what did you do before then?

23 A. Before I was assistant commissioner of  
24 prisons, I was a correctional administrator in the  
25 west region.

1 Q. Okay. And what did that job entail?

2 A. Basically oversight and supervision of the  
3 wardens for the facilities in the west region of the  
4 state; Northwest Correctional Complex, West  
5 Tennessee State Penitentiary, Martin Luttrell, those  
6 facilities there in the west region.

7 Q. When you had that position, where did you  
8 office?

9 A. Where did I -- I didn't understand you.

10 Q. Where did you office, where was your  
11 office when you had that position? Were you in  
12 Nashville or some place else?

13 A. I was in West Tennessee. My office was  
14 really and truly in the vehicle that I rode in each  
15 day because I stayed on the road every day. I  
16 visited a different facility each day, so I really  
17 didn't have a site that had an office space in it.

18 Q. So you were a road warrior?

19 A. I was on the road most days.

20 Q. Okay. Before you were a correctional  
21 administrator, what did you do before then?

22 A. I was a warden.

23 Q. Where were you a warden?

24 A. Northwest Correctional Complex and West  
25 Tennessee State Penitentiary.

1 Q. Okay. Did you go to college or any  
2 college at all?

3 A. Yes. I graduated from Dyersburg State  
4 Community College with an associates in criminal  
5 justice. I graduated from the University of  
6 Tennessee at Martin with a bachelor's in criminal  
7 justice. And I graduated from the Naval  
8 Post-Graduate School in Monterey with a master's  
9 degree in security studies.

10 Q. Okay. What year were each of your  
11 degrees?

12 A. 2013, I believe or '15 for my master's  
13 program, '95 for my bachelor's program, and '93 for  
14 the associate's program. Those are approximate  
15 dates. I think they're pretty accurate.

16 Q. Okay. And since you got the associate's  
17 degree in Dyersburg, have you had any positions that  
18 have been outside of the corrections department  
19 industry?

20 A. No.

21 Q. You've always worked in corrections?

22 A. That's correct.

23 Q. Have you always worked for TDOC or have  
24 you worked for someone else?

25 A. I've always been with TDOC since I was 19.

1 Q. Okay. And did you start out as a  
2 corrections officer?

3 A. I did.

4 Q. Where did you start?

5 A. Lake County Regional Correctional Facility  
6 in West Tennessee.

7 Q. Are you from west Tennessee originally?

8 A. I am.

9 Q. Whereabouts?

10 A. Lake County is where I grew up. Lake and  
11 Obion County. I live in Obion County now.

12 Q. Are you in Nashville giving this  
13 deposition now?

14 A. I am. I'm in my office in headquarters.  
15 I mean, everybody is back to work, right? Are you  
16 not in the office? I mean, we should be back, you  
17 know, in full fledge working in the office, right?

18 Q. I mean, I've been here every day. There  
19 are plenty of people I think have not, but I've been  
20 in my office every single day. I haven't missed a  
21 beat, so glad to hear you haven't either.

22 Okay. Other than that one meeting with  
23 your attorney that lasted 30 to 45 minutes, you  
24 haven't met with anyone else in preparation for your  
25 deposition today?

1 A. No.

2 Q. Okay. Great. And what is it that you  
3 understand that this lawsuit is about?

4 A. The lawsuit is about the alleged -- an  
5 inmate that's at Trousdale Turner who is alleging he  
6 has been denied religious items. And also, I  
7 understand in the complaint that there is an  
8 allegation of a -- I guess an 8th Amendment  
9 violation.

10 Q. Do you know what the nature of the 8th  
11 Amendment violation is?

12 A. I'm sorry?

13 Q. Do you know what is alleged to be the  
14 nature of the 8th Amendment violation?

15 A. From what I read, the -- he is alleging an  
16 unsafe environment, violence, some things that were  
17 noted in some compliance reports for critical posts  
18 not being covered, things like that that makes it  
19 unsafe, is the allegation.

20 Q. And Trousdale, is that a facility that is  
21 owned by TDOC?

22 A. No, it's not.

23 Q. Who owns Trousdale?

24 A. You know, I'm assuming that CoreCivic owns  
25 the property, the facility. I don't know about the

1 land specifically. That could be -- the county  
2 could have some ownership there. I'm not sure.

3 Q. Okay. And what is TDOC's role vis-à-vis  
4 Trousdale, the Trousdale facility?

5 A. Would you repeat the question? I didn't  
6 understand it.

7 Q. Sure. What is TDOC's role vis-à-vis, the  
8 Trousdale facility?

9 A. We contract with Trousdale County who in  
10 turn subcontracts with CoreCivic for the operation  
11 of the Trousdale facility to house TDOC inmates  
12 there at that facility.

13 Q. Explain that a little bit to me. So TDOC  
14 contracts with Trousdale County? How does that  
15 work?

16 A. We contract with the county for the  
17 housing of inmates, and then it's my understanding,  
18 in turn, they subcontract out with CoreCivic for the  
19 operation of that facility that houses about 2500  
20 inmates.

21 Q. Why is it that TDOC doesn't contract just  
22 directly with CoreCivic for the running of that  
23 facility?

24 A. Well, we only have one contract that is  
25 directly with CoreCivic, and that is for the South

1 Central Facility, and there's some legislation that  
2 only allows TDOC to contract with a private vendor  
3 from one facility. We contract with the counties  
4 for the others there at Trousdale and also Hardeman  
5 County. There's two facilities at Hardeman County  
6 that we contract with the county.

7 Q. Where does that leave TDOC, what happens  
8 at Trousdale? Do you have an obligation to know  
9 what's going on at that facility?

10 A. Yes. We have contractor monitors in place  
11 there at the private facilities that oversee policy  
12 compliance, things like that.

13 Q. Okay. I'm going to back up a little bit.  
14 So are TDOC policies supposed to be enforced at  
15 Trousdale even though it's a CoreCivic facility?

16 A. Yes.

17 Q. And maybe could you just explain to me a  
18 little bit of how that structure works. Pretend  
19 like I've never walked into a prison and I have no  
20 idea. How is it that TDOC and CoreCivic work  
21 together to manage this facility?

22 A. So as I've said, we have a contract in  
23 place for the operation and management of that  
24 facility in Trousdale County, as well as the ones in  
25 Hardeman County for the maintenance and the

1 operation of the Trousdale facility. The Department  
2 of Corrections has policies in place that covers  
3 different divisions of corrections, whether it be  
4 security policies, whether it's requirements of food  
5 service, ACA standards, things like that, and we  
6 have inspection processes that go on from time to  
7 time in our facilities. And there is a set of  
8 regulations and requirements that CoreCivic has to  
9 meet. We have contract monitors that, again, work  
10 every day there at the facility to check compliance  
11 with policy.

12 Now, policy is developed here in central  
13 office. There is a review process for our policies.  
14 Our state policies come out of central office, I  
15 sign all state policies, they're distributed to all  
16 of our facilities across the state. They have an  
17 effective date, and the requirements of those  
18 policies kind of drive the operations of our state  
19 facilities, as well as other facilities in the state  
20 of Tennessee as it relates to correctional  
21 operations.

22 And that's kind of a hodgepodge  
23 explanation of how that works, but that's primarily  
24 it.

25 Q. Thank you for that. Just to get a little



1 more basic. So the prisoners that are held at  
2 Trousdale, those are prisoners who have been  
3 sentenced by the State of Tennessee; is that  
4 correct?

5 A. Correct. Those are inmates that spend --  
6 sentenced to the custody of the State, and TDOC  
7 inmates are housed there at Trousdale, that's  
8 correct.

9 Q. So that's why TDOC would then have some  
10 control and responsibility over those inmates,  
11 because they've been sentenced to be in TDOC's care  
12 essentially; is that right?

13 A. Right. Correct.

14 Q. But I just want to make sure I understand  
15 it. But in some circumstances, TDOC does not  
16 operate the facility directly, you contract with a  
17 different company or through the county to another  
18 company like CoreCivic to run that facility and care  
19 for those inmates; is that right?

20 A. We contract with the county who  
21 subcontracts with CoreCivic for the operation of  
22 that facility.

23 Q. Okay. But TDOC still has -- still has  
24 responsibilities for those inmates that are in the  
25 care of that CoreCivic facility; is that right?

1           A.     Yes. I mean, when the inmate is convicted  
2 and sentenced to State custody, we -- yes, we have  
3 responsibility for that.

4           Q.     Okay. And who is the warden at Trousdale?

5           A.     The -- I will have to check with the  
6 assistant commissioner. The prior warden was Warden  
7 Byrd. Now, I'm sure, he was on leave for a period  
8 of time. I'm not sure if he's still there or not.

9           Q.     You had mentioned before about contract  
10 monitors being at the facility, contract monitors  
11 are TDOC employees?

12          A.     Yes, they are.

13          Q.     What are their jobs?

14          A.     Their jobs are to monitor compliance,  
15 compliance with policy, state policy, the records,  
16 compliance for ACA standards, things like that that  
17 reflect our policies in general.

18          Q.     If something was to be out of compliance,  
19 they would report that back to TDOC?

20          A.     Yes. That's reported back to TDOC, as  
21 well as to the facility administration, to  
22 CoreCivic, to request a plan of corrective action  
23 for the non-compliant finding.

24          Q.     And who is responsible for making sure  
25 that that plan of action is implemented?

1           A.     Well, the State of Tennessee through the  
2 Department of Corrections, we hold the contract of  
3 the vendor responsible for compliance with the plan  
4 of corrective action.

5           Q.     Okay. Who would be responsible for  
6 ensuring that they are compliant with the plan of  
7 corrective action?

8           A.     TDOC monitors that through our contract  
9 monitoring process and our monitors that are on  
10 site. At the end of the day, we check compliance,  
11 if plans of corrective actions have not been met,  
12 then TDOC holds the vendor responsible through  
13 corrective actions, liquidated damages, et cetera.

14          Q.     When you say corrective actions,  
15 liquidated damages, et cetera, what do you mean?

16          A.     Well, by corrective actions, I mean the  
17 steps that's taken by the party to address whatever  
18 finding it may be, whether it's a finding related to  
19 security violation or a post-order violation or  
20 whatever violation it may be, the plan of corrective  
21 action has to be met and has to be accepted. The  
22 vendor has to follow through with what they say  
23 they're going to do to resolve the issue to meet the  
24 policy requirement, and that our compliance monitors  
25 check for compliance to verify that that has

1 happened. If it has not happened, then we follow  
2 through with further action related to, you know,  
3 liquidated damages, et cetera, for the violation.

4 Q. When you say liquidated damages, what do  
5 you mean by that?

6 A. It's a monetary penalty that has to be  
7 paid by the vendor where funds are held back for a  
8 violation that has not been corrected.

9 Q. And do you know how much money, if any, in  
10 the liquidated damages that CoreCivic has had to pay  
11 for the Trousdale facility?

12 MR. AUMANN: Objection. Objection to  
13 form. You can go ahead and answer.

14 THE WITNESS: You know, I do not know. I  
15 couldn't tell you right now exactly how much that  
16 is, so for a specific number, I don't have that in  
17 front of me.

18 BY MS. HERZFELD:

19 Q. Do you have an estimate?

20 MR. AUMANN: Same objection. Form. You  
21 can go ahead and answer.

22 THE WITNESS: It's in the millions of  
23 dollars, but I don't know the exact number.

24 BY MS. HERZFELD:

25 Q. Do you know what those liquidated damages

1 with CoreCivic and Trousdale have been for, who  
2 types of violations?

3 A. Yes. It's a multitude of things related  
4 to staffing patterns, critical posts in some cases  
5 not being covered. Again, I would have to review  
6 some of the paperwork to give you specifics on that,  
7 but it's -- all violations are failure to meet  
8 corrective action plans for a multitude of different  
9 requirements.

10 Q. Okay. Other than getting to the  
11 liquidated damages portion of it, what else could  
12 TDOC do to ensure compliance with the contract? Is  
13 there any other tools that you have?

14 A. We work with CoreCivic just like we  
15 work -- that I work with our facilities or our  
16 compliance teams work with our facilities across the  
17 state. It's the same process, as far as monitoring  
18 our facilities. We have a compliance section that  
19 does that, and, you know, we work with the vendor,  
20 we work with our state facilities to review policy  
21 to help -- to make sure there is no issues that --  
22 or issues that we might could resolve to help in the  
23 management of a correctional environment. It's very  
24 complex work. It's very difficult work, and it's  
25 hard to explain unless you've been there and worked

1 in that environment. But we feel like having those  
2 contract monitors in place to work with the facility  
3 to help with compliance is the primary tool that we  
4 use at the state level to help them ensure  
5 compliance.

6 Q. So I just want to back up a little bit.  
7 So we talked about the contract monitors making a  
8 report that somebody's out of compliance and, you  
9 know, a follow-up on that, so that's one type of  
10 corrective action that TDOC can take to ensure  
11 compliance of the contract; is that right?

12 A. That's correct.

13 Q. And then you also said that there's  
14 liquidated damages, there's a liquidated damages  
15 provision that you can exercise to ensure compliance  
16 with the contract; is that right?

17 A. Correct.

18 Q. What other tools does TDOC have to ensure  
19 compliance of the contract?

20 A. I believe that's about it.

21 Q. Okay. So I want to make sure I  
22 understand. So if there was a violation of the  
23 contract and you've kind of gone back and forth with  
24 the contract monitors and you've gotten to the point  
25 of liquidated damages, does the number just keep

1 going up and up until finally, hopefully somebody  
2 corrects it or what happens?

3 A. Again, I think we work with the vendor to  
4 try to ensure that they come into compliance, right.  
5 It's hard to explain that. You may have an issue  
6 with say, for instance, a vendor may have an issue  
7 with filling a critical post and we -- there's a  
8 violation there, there's liquidated damages, could  
9 be liquidated damages imposed, but then we work with  
10 the vendor. The vendor advises us that they're  
11 working to fill positions. They may take some  
12 action on their part to be able to hire more people,  
13 to bring more people on board, which ultimately  
14 corrects the corrective action or meets the  
15 corrective action that's been put in place.

16 And at some point, they could have another  
17 downswing in employee numbers and that violation  
18 could come up again, so we would continue to work  
19 with the vendor to try to ensure compliance. I  
20 guess that's my explanation for that.

21 Q. What if it doesn't work, what other tools  
22 do you have available?

23 A. That's our process. That's -- that's the  
24 tools that we have available, the contract monitors,  
25 enforcing compliance with the vendor, and working

1 with the vendor on a daily basis to ensure  
2 compliance.

3 Q. Is it your understanding that TDOC has a  
4 responsibility to ensure that the constitutional  
5 rights of prisoners are being protected when they're  
6 in TDOC's custody and care?

7 A. Yes.

8 Q. That includes when a prisoner is at any  
9 facility within Tennessee; is that right?

10 A. Within Tennessee?

11 Q. Yes, sir.

12 A. Repeat that question, please. I'm sorry.

13 Q. I'll rephrase it. So TDOC's  
14 responsibility is to ensure that the constitutional  
15 rights of prisoners are being protected, would also  
16 includes prisoners that are at Trousdale; is that  
17 right?

18 A. That's correct.

19 Q. So if you had a situation where liquidated  
20 damages wasn't bringing TDOC in compliance, your  
21 position is there's nothing else -- I'm sorry, I'm  
22 going to back up and say that again. Your position  
23 is that if liquidated damages are not bringing  
24 CoreCivic into compliance with some rules violation,  
25 something that's going on, that there's not another



1 option for TDOC to come in at that point?

2 A. Well --

3 MR. AUMANN: Objection to form. You can  
4 go ahead.

5 THE WITNESS: Ultimately, I mean, I think  
6 that, you know, TDOC would come in, we could look at  
7 the possible stepping away from the contractor,  
8 removal of the contract at some point, yes. That is  
9 another option that we would have.

10 BY MS. HERZFELD:

11 Q. Could you take over the facility?

12 A. Well, we could. There's some language in  
13 the contract that will allow us to take over the  
14 facility or the management of the facility, yes.

15 Q. Has TDOC ever had to do that?

16 A. No, we have not.

17 Q. Has there ever been a conversation that  
18 you're aware of that has explored the possibility of  
19 TDOC taking over Trousdale?

20 A. No, there has not.

21 Q. What about a partial takeover?

22 A. No.

23 Q. Okay.

24 MR. AUMANN: Object to form. You can go  
25 ahead.

1 BY MS. HERZFELD:

2 Q. To your knowledge, has there ever been any  
3 conversations about any tools TDOC would have to  
4 bring Trousdale into compliance other than  
5 liquidated damages?

6 A. None other than what I've already  
7 mentioned.

8 Q. So to be clear, I just want to make sure I  
9 understand, so vis-à-vis Trousdale, the Trousdale  
10 facility and CoreCivic, the only conversations that  
11 you're aware of to ensure compliance of the contract  
12 has been utilization of the contract monitors and  
13 liquidated damages provision of the contract; is  
14 that right?

15 A. That and other -- other than the other  
16 things that I have mentioned such as, again,  
17 providing oversight through our contract monitors,  
18 our correctional administrator who oversees those  
19 facilities and working with the vendor to ensure  
20 compliance. That's it.

21 Q. Okay. You personally ever have any  
22 interaction with the contract monitors at Trousdale?

23 A. No. I would say they -- very seldom. I  
24 may see them during a site visit or something like  
25 that, or I may have conversations with the inspector

1 general for the Department related to secondhand  
2 information through the contract vendors for  
3 Trousdale and private facilities, but, no, not  
4 direct interaction with them on a daily basis or  
5 even a weekly basis, no.

6 Q. Do you know what a noncompliance report  
7 is?

8 A. Yes.

9 Q. What is it?

10 A. It's a report that the contract monitors  
11 complete to put the vendor on notice of a  
12 noncompliant issue.

13 Q. Do you review the noncompliance report  
14 from Trousdale?

15 A. Not every one, no.

16 Q. Which ones do you review?

17 A. From time to time, I'll see a report for  
18 noncompliance. Those are usually directed through  
19 the contract monitors, through the IG, and then sent  
20 to the vendor for a plan of corrective action and  
21 given a period of time for that plan of corrective  
22 action to take place. Most of the time, the ones I  
23 see end up where there has not been -- the plan of  
24 corrective action has failed, there was no action  
25 taken or the action did not resolve the issue and

1 liquidated damages would be taken. At that point, I  
2 would see a letter that I sign that goes through --  
3 to the county for withholding funds for the  
4 liquidated damages.

5 Q. Okay. And you had to do that for  
6 Trousdale?

7 A. Yes.

8 Q. How many times?

9 A. I don't remember.

10 Q. More than two?

11 A. Yes.

12 Q. Would you say more than a dozen?

13 A. Probably. I'm not sure, though. I would  
14 have to go back and look at the documentation to  
15 give you an accurate number.

16 Q. Who oversees the contract monitors at  
17 Trousdale?

18 A. They are supervised through the compliance  
19 office ultimately that lies with the inspector  
20 general for the Department.

21 Q. Who does the inspector general for the  
22 Department report to?

23 A. He reports to me.

24 Q. Who is the inspector general for the  
25 Department?

1           A.     Kelly Young.

2           Q.     How long has Kelly Young been in that  
3 position?

4           A.     Since about March or April of last year.

5           Q.     Who was in the position before Kelly  
6 Young?

7           A.     Kelly was the first individual in that  
8 position. That IG position was created by me last  
9 year. It's a new position for the Department. In  
10 prior years, the Office of Investigation and  
11 Compliance supervised the contract monitors for the  
12 Department.

13          Q.     Who would that have been?

14          A.     The director of the Office of  
15 Investigation and Compliance is Donna Turner.

16          Q.     Is Donna Turner still in that position?

17          A.     Yes. She is over the law enforcement  
18 division. Now it's the Office of Investigation and  
19 Conduct. We took the compliance section out --  
20 they -- contractor monitors, they work for Kelly  
21 Young.

22          Q.     Okay. And why --

23          A.     Under the supervision of Kelly Young.

24          Q.     Why did you create that new position?

25          A.     We felt like it was a better fit for the

1 Department to separate the contract monitoring,  
2 contract compliance section for the Department and  
3 remove it from -- at the time, fiscal services used  
4 to supervise contract administration, and we felt  
5 like we wanted to separate contract administration  
6 from the fiscal division of the Department, so when  
7 we created the IG position, which is over contract  
8 and contract monitoring, we felt it appropriate to  
9 also put those contract monitors for the private  
10 prisons under his shop, also.

11 Q. So before you created this new position,  
12 did you feel like the contracts were being  
13 adequately monitored or was there room for  
14 improvement?

15 A. No, I felt like we were monitoring the  
16 contracts correctly, but you have to think about,  
17 you know, the State of Tennessee, Department of  
18 Corrections, I'm talking about other contracts,  
19 also. Contracts with -- regarding health services,  
20 contracts regarded mental health services, contracts  
21 regarding inmate telephone service, things like  
22 that. And our premise was to move -- we didn't want  
23 the fiscal director or the chief financial officer  
24 for the Department who was over the money side of  
25 the house also looking at contract compliance and

1 contract administrations as a whole for the  
2 Department. So we shifted that and created a new  
3 position, and that was also part of the corrective  
4 action plan that we put in place as a Department in  
5 regards to the comptroller's audit, the latest  
6 comptroller's audit.

7 Q. Okay. Have you ever met with the  
8 executives at CoreCivic?

9 A. Yes.

10 Q. Which executives?

11 A. Are you talking about meetings since I've  
12 been commissioner?

13 Q. Yes, sir.

14 A. I've met with Damon Hunter, I've met with  
15 Patrick Swindle, I've met with Jerry Langford, and  
16 it could be others. I can't remember to be sure,  
17 but that's some of the ones I've met with.

18 Q. Have you met with these individuals in  
19 person or over the phone?

20 A. Both.

21 Q. Okay. And where have you met with them?

22 A. Well, at different locations. I've seen  
23 these people at conventions, ACA conventions, I've  
24 seen them at the facility before when I was on a  
25 facility tour. I've seen them there. I've met with

1     them in central office from time to time, so a  
2     multitude of places.

3           Q.     When you say central office, do you mean  
4     TDOC central office?

5           A.     Yes.   That's correct.

6           Q.     Have you been to CoreCivic headquarters  
7     here in Nashville?

8           A.     No, I have not.

9           Q.     Have you ever socialized with any of the  
10    individuals that work at CoreCivic?

11          A.     Socialized?

12          Q.     Yes.   Have you gone for a meal?

13          A.     Gone for meal at the facility?

14          Q.     Have you gone for a meal with any of  
15    individuals that you just talked about?

16          A.     No, not that I recall.   No.

17          Q.     Okay.   What about a drink?

18          A.     Not that I recall, no.

19          Q.     A social event like a baseball game or  
20    anything like that?

21          A.     The only thing, I guess a social event,  
22    that could qualify as a social event would be if, in  
23    my participation with the correctional leaders  
24    association, which is an association of all the  
25    state corrections commissioners in the country, I



1 might see them at one of those events from time to  
2 time, but, no, not that I can recall ever going to a  
3 social event just with one of those individuals from  
4 CoreCivic, no.

5 Q. Have you ever been to an event that's been  
6 sponsored by CoreCivic?

7 A. I could have. I don't remember a specific  
8 event, but when we go to a convention and have an  
9 event that, you know, 300 people is at, I don't know  
10 that -- I can't say for sure if CoreCivic did or did  
11 not in some way sponsor some of those events for the  
12 conference. I'm not sure.

13 Q. Do you have the cell phone number of any  
14 of the individuals that you just talked about,  
15 Mr. Hunter, Swindle or Langford?

16 A. Probably so. I probably have 4 or 500  
17 cell phone numbers in my cell phone, so it's very  
18 possible.

19 Q. Do you know if you've ever texted any of  
20 those individuals?

21 A. Not that I recall.

22 Q. Okay. What about e-mail, have you  
23 e-mailed with any executives at CoreCivic?

24 A. More than likely I have, but I don't know.  
25 I don't remember any specific incident of e-mailing

1 or texting those individuals.

2 Q. What about Jason Medlin, do you know Jason  
3 Medlin?

4 A. I do.

5 Q. Do you have Jason Medlin's cell phone  
6 number?

7 A. Yes, I'm sure I do.

8 Q. Have you ever texted with Mr. Medlin?

9 A. Very possible. I text -- back when  
10 Jason -- Jason used to be kind of a regional guy  
11 over the facilities even back to my time when I was  
12 the correctional administrator and Jason come to  
13 Tennessee, it's possible that I would have texted  
14 with him then, and, you know, I text -- I  
15 communicate with so many people, I would have to go  
16 back and review the records to be sure, but it's  
17 possible I did.

18 Q. How many cell phones do you have?

19 A. I have one.

20 Q. Is that a TDOC issued cell phone or your  
21 personal cell phone?

22 A. That's my personal cell phone.

23 Q. And do you from time to time conduct state  
24 business on your personal cell phone?

25 A. I do.

1           Q.    Do you get paid or reimbursed at all for  
2 that cell phone?

3           A.    I do not.

4           Q.    Do you make it a habit of backing up work  
5 information, work communications that you have on  
6 that cell phone?

7           A.    I do not.

8           Q.    Do you know what the document retention  
9 policy is for the State of Tennessee?

10          A.    I would have to go back and review that.

11          Q.    Do you know what the document retention  
12 policy is for TDOC, how long?

13          A.    I'm not sure.

14          Q.    Okay. But I want to make sure I  
15 understand it. You don't include communications  
16 you've had on your cellular phone and holding onto  
17 documents under the document retention policy for  
18 TDOC?

19          A.    If I have --

20               MR. AUMANN: Objection to form. You can  
21 go ahead.

22               THE WITNESS: If I had documents or  
23 information on my phone, if there is a request for  
24 those, then that would be included in any request  
25 for information that I might have.

1 BY MS. HERZFELD:

2 Q. But you don't routinely back it up and  
3 save it?

4 A. The account -- just like my e-mails on the  
5 phone is the account that I had with the state  
6 throughout, so the e-mails on my phone for business  
7 is the same Outlook account that I use in my office.

8 Q. But for texting or call logs of whom  
9 you've called, those things would not be preserved  
10 from your cell phone; is that right?

11 A. I don't take any additional -- any  
12 additional activity to back those up, no, I do not.

13 Q. Do you know if there's an auto delete  
14 policy or anything on your cell phone?

15 A. I do not.

16 Q. And if you pay the bill yourself, do you  
17 know if those bills are logged some place, call  
18 logs?

19 A. If they're what? I'm sorry.

20 Q. Do you turn them over to the State to be  
21 logged, your call logs?

22 A. No, I do not.

23 Q. Have you ever socialized with Mr. Medlin?

24 A. Define socialize. Again, Jason would be  
25 at some of these conventions that I -- we don't

1 socialize on a friendship level, I guess. It's  
2 primarily business with the exception of if I see  
3 Jason or if I see Patrick at a convention and say  
4 hello, they may be in the same room with me at an  
5 event, but, no, I do not socialize on a social level  
6 really with any of those people that you mentioned.

7 Q. Okay. Great. And have you received  
8 anything of value from anyone at CoreCivic?

9 A. No.

10 Q. Is there a policy in place that would  
11 prevent you from accepting something of value from  
12 someone at CoreCivic?

13 A. Well, it's -- yes, there is a -- I would  
14 have to look at the details, but, yeah, it would not  
15 be appropriate for me to receive items of value from  
16 CoreCivic.

17 Q. Okay. Why is it that that wouldn't be  
18 appropriate?

19 A. Because we oversee the contract, we  
20 oversee business that we have with those people.

21 Q. And likewise, it wouldn't be appropriate  
22 for anyone that reports to you to receive something  
23 of value from CoreCivic; is that right?

24 A. Correct.

25 Q. And if you found out that someone that

1 worked for you was receiving something of value from  
2 CoreCivic, how would you react to that?

3 A. I would have that investigated, looked  
4 into, and we would follow the policies and the laws  
5 of the State of Tennessee.

6 Q. Okay. Great. What types of topics have  
7 you discussed with executives from CoreCivic?

8 A. Repeat that question, please.

9 Q. You said before that you, you know, spoke  
10 with a couple of different executives that you named  
11 off at CoreCivic; is that right?

12 A. Yes.

13 Q. What types of things would you talk to  
14 them about?

15 A. It would be, you know, corrections in  
16 general. I don't remember the specifics of  
17 conversations like that. It would be corrections  
18 related. You know, we might -- someone might ask  
19 about, you know, your family doing okay, yes, you  
20 know, things like that, just in general  
21 conversation, but it would be primarily, you know,  
22 corrections industry type topics, things like that.

23 Q. Nothing of a personal nature other than,  
24 how is your family?

25 A. Yeah. No. Correct.

1           Q.    Do you know if you have ever spoken to any  
2 executives at CoreCivic about the Trousdale  
3 facility?

4           A.    Did I ever what?  I'm sorry.

5           Q.    Speak to any executives at CoreCivic about  
6 the Trousdale facility?

7           A.    It's very possible that we could have  
8 mentioned something about Trousdale.  I think I  
9 would -- it would be natural for me if they had a  
10 question, although I don't remember any specific  
11 question or conversation, but it would be very  
12 common if they, you know, had a question about a  
13 facility or if there was a particular issue about  
14 one of those private facilities that we could have  
15 had a conversation.

16          Q.    Okay.  Have you ever personally had a  
17 conversation with the contract monitors at Trousdale  
18 about how things have been going?

19          A.    It's possible that I could have over the  
20 years, but I don't remember any specific details of  
21 a conversation that I would have had.

22          Q.    Okay.  In general, who have you spoken to  
23 about the Trousdale facility?

24          A.    Most of my conversations about facility  
25 operations would be with the assistant commissioner

1 of prisons for the Department.

2 Q. Who is that?

3 A. Lee Dotson.

4 Q. Do you have an opinion of how things are  
5 going at Trousdale?

6 A. I think Trousdale is a very difficult  
7 facility to manage. I think that there's been  
8 issues at Trousdale. That's obvious by the report,  
9 the compliance reports, but I would also say that to  
10 be fair that I have issues in the state facilities,  
11 also. When you talk about the difficulty of hiring  
12 correctional officers and the number of vacancies  
13 that we have at the state level. Trousdale has  
14 significant challenges, just like I do at some of my  
15 state facilities. It's been a difficult, you know,  
16 year. I would also say that, you know, at  
17 Trousdale, it's still a relatively new facility,  
18 even though it's been open since '16, from a  
19 correctional practitioner standpoint, it takes  
20 several years to establish a facility as an older  
21 facility, one that's more settled.

22 We went through some of the same things at  
23 Northwest Correctional Complex when we opened it  
24 back in the '90s. When you take inmates from across  
25 the state and move them, you tend to have more



1 inmate issues, but, again, to answer your question,  
2 I think Trousdale has significant challenges that  
3 they've been working on.

4 Q. You think Trousdale is safe?

5 A. I think Trousdale is safe. I do. It's  
6 just like any correctional environment, it's not a  
7 matter of when -- if bad things are going to happen,  
8 it's a matter of when, because of the individuals  
9 you have inside that facility that have violent  
10 histories, that have a tendency for violence that  
11 have -- could have mental health issues. All of  
12 those things play into the complexities that we deal  
13 with in corrections in every state. When you talk  
14 about corrections departments, it's really a complex  
15 non-forgiving environment, really.

16 Q. You said that the warden at Trousdale was  
17 Warden Byrd?

18 A. Yes. I think -- I don't know. I  
19 apologize. I'd have to go back and talk to Lee,  
20 because I think there's been an administrative  
21 change there recently, but I would have to go back  
22 and look.

23 Q. How recent?

24 A. I think within the last few weeks.

25 Q. Okay. What was the administrative change?

1           A.     It's my understanding, the warden was  
2 replaced there, or being replaced, in the process of  
3 being replaced. Again, this is conversation that  
4 I've had with the AC of prisons that work for me,  
5 and I don't remember the detail of the conversation.

6           Q.     Do you know why he was being replaced?

7           A.     There was a use of force there that was in  
8 question and that the warden was directly involved  
9 in.

10          Q.     He was directly involved in the incident  
11 itself?

12          A.     It was my understanding that's the case,  
13 yes.

14          Q.     What was the incident?

15          A.     I don't remember the details of the  
16 incident. I'd have to go back and review the  
17 documents on that.

18          Q.     What documents would you review?

19          A.     I would review the -- well, when I said  
20 documents, I would have to talk to the AC of prisons  
21 to get the details and the investigation report.

22          Q.     Okay. And do you know if Warden Byrd has  
23 been absent from Trousdale for weeks at a time?

24          A.     I'm not sure. Again, I would have to talk  
25 with the AC of prisons about that.

1 Q. And who was managing the facility when  
2 Warden Byrd has been out?

3 A. Again, I would have to talk with the AC of  
4 prisons to verify that.

5 Q. You don't have an idea off the top of your  
6 head?

7 A. I do not, no.

8 Q. And you knew you were giving a deposition  
9 about the Trousdale facility today; is that right?

10 A. That's correct.

11 Q. But you didn't familiarize yourself with  
12 that information for your deposition today?

13 A. I did not, no.

14 Q. Warden Byrd, was he a TDOC employee or a  
15 CoreCivic employee?

16 A. He was a CoreCivic employee.

17 Q. Did you have any involvement in  
18 recommending that he be removed from his position?

19 MR. AUMANN: Objection to form. You can  
20 go ahead.

21 THE WITNESS: That would have been a  
22 discussion between the AC of prisons, the assistant  
23 commissioner of prisons, Lee Dotson and myself, yes.

24 BY MS. HERZFELD:

25 Q. Okay. And what was that discussion?

1           A.     That we feel like that there needed to be  
2 a leadership change there with Mr. Byrd.

3           Q.     Okay. And what was the nature of why you  
4 thought there needed to be a leadership change with  
5 Mr. Byrd?

6           A.     It involved the incident, the use of force  
7 incident there at the facility.

8           Q.     Did that have to do with someone being  
9 pepper sprayed and shot with beanbag rounds?

10          A.     That's correct, yes.

11          Q.     Were there any other concerns about Warden  
12 Byrd or was that the only one?

13          A.     Well, that was the primary concern that we  
14 had in reviewing the information that we received,  
15 but, again, I don't remember the specific details.  
16 I'd have to go back and review the incident, the  
17 investigation report.

18          Q.     Did you have other concerns about Warden  
19 Byrd?

20          A.     No. Not in particular, no.

21          Q.     So you didn't have concerns about other  
22 incidents using excessive force?

23          A.     No --

24                   MR. WELBORN: Object to the form.

25                   BY MS. HERZFELD:

1           Q.    Did you meet with any executives at  
2 CoreCivic about reassigning Warden Byrd?

3           A.    No, I did not.

4           Q.    What about anyone at CoreCivic, did you  
5 talk to anybody at CoreCivic about reassigning  
6 Warden Byrd?

7           A.    All my conversations that I recall were  
8 with my assistant commissioner of prisons.

9           Q.    Do you know if your assistant commissioner  
10 had any conversations with anyone at CoreCivic about  
11 replacing Warden Byrd?

12          A.    It's my understanding that Lee Dotson had  
13 conversations with some of the supervisors of the  
14 warden. Now, I don't know specifically if that  
15 would be Jason or Patrick Swindle, but I'm sure he  
16 did, yes.

17          Q.    Okay. Do you know who is going to be the  
18 new warden at Trousdale?

19          A.    I would have to -- again, I would have to  
20 review the documents and talk to Lee Dotson.

21               MS. HERZFELD: We've been going for about  
22 an hour. Let's take a break for about five minutes.

23               (Brief break observed.)

24          BY MS. HERZFELD:

25          Q.    Moving on to the religion claims, if

1 you'll look at your screen right in front of you,  
2 you should see what is policy number 116.08; do you  
3 see that?

4 A. I do.

5 Q. And are you familiar with that policy?

6 A. Somewhat familiar, yes.

7 Q. Is that the policy having to do with  
8 religious diet program and feast?

9 A. That's correct.

10 Q. Can you see it on the screen in front of  
11 you?

12 A. Yes.

13 Q. Okay. Do you see it has an effective date  
14 of January 1st, 2016; is that right?

15 A. That's correct.

16 Q. In the upper left-hand corner, it says  
17 approved by, and who is that?

18 A. That would be Derrick Schofield.

19 Q. And who is Derrick Schofield?

20 A. He is the previous commissioner of  
21 corrections for the State of Tennessee.

22 Q. And when he approved the policy, are those  
23 policies still in place?

24 A. Yes. That policy is still effective. I  
25 don't know if it's a new policy or not, but, yes,

1 it's still in place.

2 Q. Okay. And do you know if this is the most  
3 up-to-date version of this policy?

4 A. I'll check.

5 Q. Mr. Parker?

6 A. Yes.

7 Q. Are you looking in your computer?

8 A. I am looking at my paperwork. I'm sorry.

9 Q. No. That's okay. It's hard because we're  
10 doing these over Zoom, and I'm trying to keep the  
11 record to what we've got right in front of you, so  
12 maybe I'll back up and withdraw my question and I'm  
13 going to ask it again; does that work?

14 A. Sure.

15 Q. Okay. Great. So what I've shown you here  
16 on this screen is policy 116.08 with an effective  
17 date of January 1, 2016. I'll submit to you that I  
18 believe there is an updated version of this policy,  
19 but for the purposes of my question, I'm going to  
20 stick with this one right here, okay?

21 A. Okay.

22 Q. And you can see it right there?

23 A. Yes.

24 Q. Okay. Very good. If we will scroll down,  
25 I don't have -- give me one second here. We can

1 scroll down to Section VI D2. See right there.

2 Section VI, Religious Holiday Feast, Menu Program;  
3 do you see where I'm at?

4 A. I do.

5 Q. Then D2. Do you see where it's at number  
6 2 right there?

7 A. I do.

8 Q. Okay. Could you read 2 for me, please?

9 A. Says, TDOC will serve a special meal  
10 through food service provided to all population for  
11 the following feasts to be observed. A, Christian,  
12 (Christmas, Easter); and B, Muslim, (Ramadan and the  
13 Feast of Abraham).

14 Q. Are you familiar with the Feast of  
15 Abraham?

16 A. Somewhat. Not in detail, no.

17 Q. What do you understand it to be?

18 A. Again, it's an observance that the Islamic  
19 faith practices for a special meal. I don't know  
20 the specifics or the meaning as far as in a  
21 religious context.

22 Q. Have you also heard of the Feast of Eid?

23 A. Yes.

24 Q. Do you know that to be the same thing?

25 A. It could be. You know, my recollection of



1 that is the breaking of the fast, being Ramadan. As  
2 a warden, there would be a meal for the Muslim or  
3 the Islamic faith, people practicing that faith.  
4 That's my recollection.

5 Q. And you mentioned Ramadan. Do you know  
6 what Ramadan is?

7 A. Yes. Somewhat.

8 Q. What's your understanding?

9 A. I'm sorry?

10 Q. What is your understanding of what is  
11 Ramadan?

12 A. Ramadan is usually an observance, if I'm  
13 not mistaken, it usually lasts about a month where  
14 people of Islamic faith practice a period of fasting  
15 and not eating, fasting during a particular time of  
16 the day, usually during the day, and then following  
17 that, the breaking of the fast or the end meal would  
18 be prepared for them as they come out of the holy  
19 month of Ramadan to be able to have a meal that's  
20 celebrating I guess the breaking of the fast.

21 Q. And going back -- thank you for that. Did  
22 I interrupt you? So looking back at number 2 that's  
23 on your screen there where it says, through food  
24 service provided to all populations. Do you know  
25 what that means?

1           A.     Yeah.  So that -- I would consider that  
2     being a special meal that was provided through the  
3     food service operation at the facility for the  
4     particular meals that are mentioned there in A and  
5     B.

6           Q.     And who handles food service for  
7     Trousdale?

8           A.     Trousdale, the facility would be  
9     responsible for the food service operations.  I'm  
10    not for sure if they have a vendor or if they do it  
11    themselves.

12          Q.     Okay.  Who would know the answer to that  
13    question?

14          A.     People at Trousdale.  I'm sure that if I  
15    were to ask my contract administrator or the  
16    contract monitors, they could tell me, but I'm not  
17    familiar especially with who manages and supervises  
18    the food service operation.

19          Q.     Okay.  If you'll look back with me to the  
20    screen, if we go back to VI A.  We have VI A,  
21    religious diet requirements shall be met as follows,  
22    see that?

23          A.     I do.

24          Q.     If you go VI A 2, could you read that for  
25    me, please?

1           A.     Kosher, Halal, and the House of Yahweh  
2 meals shall be provided in accordance with the  
3 common fare menu developed by the food service  
4 director, TDOC dietician, and in consultation and  
5 approval by a qualified religious adviser to ensure  
6 adherence to religious requirements and to ensure  
7 nutritional adequacy.

8           Q.     And do you know what Halal foods are?

9           A.     Those primarily are foods that do not  
10 contain pork or derivatives of pork or cooked with  
11 alcohol, things like that.

12          Q.     Okay. Do you know what this policy means  
13 by, in accordance with common fare menu. What is  
14 common fare menu?

15          A.     I don't know. I'm not familiar with that.

16          Q.     Okay. This portion of the policy  
17 references qualified religious adviser. Who is  
18 TDOC's qualified religious adviser?

19          A.     So we have a director of religious  
20 services that supervises, oversees the religious  
21 programs and protocols for the Department who works  
22 for the assistant commissioner of rehabilitation for  
23 the Department. I also know that in the past, there  
24 have been opportunities for the director of  
25 religious services to speak to or to consult with

1 outside religious advisers. Say, for instance, an  
2 Imam possibly for the Islamic group or things like  
3 that, as far as to provide consultation relating to  
4 requirements of people practicing the Islamic faith,  
5 as well as some other religious affiliations, also.

6 So I don't know specifically who that  
7 person would be. That would be a question probably  
8 for the director of religious services.

9 Q. So I want to make sure I understood that  
10 answer. So there's an opportunity to consult with  
11 someone to make sure that the food is in conformance  
12 with the Muslim faith. Did I understand your answer  
13 right?

14 A. I think the Department of Corrections has  
15 the option of seeking information relating to  
16 specific religious services as far as the  
17 requirements of the tenets of a faith, requirements  
18 of that practicing that faith, to consult with  
19 outside religious leaders, I would say. The example  
20 I would give would be like an Imam or something that  
21 would be able to advise the director of religious  
22 services and the Department on specific  
23 requirements.

24 Q. And do you know if TDOC has consulted with  
25 a religious adviser about the Halal foods?

1           A.     I do not. I know years ago, we had  
2     conversations, I know, and that was a service that  
3     was provided years ago, I think when I was AC of  
4     prisons, but I'm not sure today if they continue to  
5     do that or if they're still using the same  
6     regulations and advice that we received back then.

7           Q.     Who would know that?

8           A.     The director of religious services would  
9     be a good one to talk to, or the assistant  
10    commissioner of rehabilitation for the Department.

11          Q.     And would consulting someone on the  
12    religious requirements of a meal be a best practice  
13    that TDOC should be adhering to?

14          A.     I think the requirements of particular  
15    faith groups reaching out to a recognized religious  
16    leader is -- would be a best practice to -- if the  
17    Department felt like it needed some guidance or  
18    direction in particular -- answering particular  
19    questions or issues related to the practice of a  
20    particular faith group, that that would be something  
21    that we would engage in. We've done that before, as  
22    I've said, and, yes, I would have no issue with that  
23    whatsoever.

24          Q.     Do you know what percentage approximately  
25    of prisoners in TDOC custody at any given time are

1 Muslim?

2 A. No, I don't know that. I don't know.

3 Q. All right. Would you say each facility  
4 that you've ever been involved in has had a  
5 population of practicing Muslim prisoners?

6 A. Yes. That would be a fair statement, yes.

7 Q. So it's not like a particularly unusual  
8 religion for --

9 A. No, it's not unusual. It's not an unusual  
10 religion. It's one that I have found, though, that  
11 have in the past been hard to recruit and have  
12 certified volunteers that come in and help lead  
13 those services. It's been difficult for years to  
14 find outside sources and volunteers that were  
15 willing to come in and assist the Department with  
16 the administration of those services.

17 Q. But we're talking about food services  
18 right now, so as far as food goes, it's not like,  
19 you know, having to have Halal food is something  
20 terribly unusual that you're going to have to find  
21 somebody specialized in some strange corner of the  
22 country.

23 A. No, I didn't mean --

24 MR. AUMANN: Object to form.

25 BY MS. HERZFELD:

1 Q. So it's a pretty usual and recognized type  
2 of food, Halal; is that right?

3 A. Yes. I would say so.

4 Q. Are you familiar with Kosher food?

5 A. Somewhat.

6 Q. What do you understand Kosher food to be?

7 A. Food prepared a particular way, special  
8 guidelines. It's usually, if I'm not mistaken, it's  
9 associated with Jewish faith, and I don't remember  
10 the specifics of the requirements for Kosher meals.

11 Q. Do you know which outside vendors the  
12 prisons in Tennessee use for their food services?

13 A. Yes. We use -- the State of Tennessee,  
14 Department of Corrections uses Aramark for our food  
15 service operation.

16 Q. Do you know if Aramark has Halal foods?

17 A. I believe they do. I believe so. Again,  
18 that's -- again, to be absolutely certain, I would  
19 ask our AC of prisons and rehab services, but I'm  
20 assuming they do, yes.

21 Q. Have you heard of Trinity Food Service?

22 A. I have heard of that, yes.

23 Q. Do you know who they are?

24 A. They're a vendor that provides food  
25 service operations.

1 Q. Do you know if they contract with  
2 CoreCivic?

3 A. I do not, no.

4 Q. Do you know if TDOC has ever had Muslim  
5 individuals or a Muslim cleric look over the menu  
6 that Aramark serves for Muslim foods or Halal foods?

7 A. It's possible, but I'm not for sure.

8 Q. Who would know the answer to that?

9 A. Again, the director of religious services  
10 for the Department of Corrections or the assistant  
11 commissioner of rehabilitation.

12 Q. You'd agree with me who is an observant  
13 Muslim, they have a constitutional right to have a  
14 Halal meal that is in conformance with their  
15 religious observance?

16 MR. AUMANN: Objection to form. You can  
17 ahead.

18 MR. WELBORN: Same objection.

19 THE WITNESS: Yes. As far as I'm  
20 concerned, yes.

21 BY MS. HERZFELD:

22 Q. Who is responsible at TDOC for ensuring  
23 that CoreCivic complies with a Halal menu for a  
24 devout Muslim in their care?

25 A. So, again, that is something that is in



1 our policy. The commissioner of the Department of  
2 Corrections and the State of Tennessee would be  
3 responsible for monitoring compliance with state  
4 policy.

5 Q. Okay. And specifically that monitoring of  
6 compliance with the policy would be done through the  
7 contract monitors of the facility?

8 A. That's correct.

9 Q. Do you know of any other actions that  
10 would be taken to ensure that compliance of the  
11 contract for foods in conformance of one's religious  
12 observance?

13 A. Other than the things that I mentioned  
14 earlier with our monitoring inspection process,  
15 things like that, addressing any inmate grievances  
16 that we may come into contact with. Those would be  
17 the primary mechanisms that we would use.

18 Q. Would you say that the majority of  
19 prisoners in TDOC are Christian?

20 MR. AUMANN: Objection to form.

21 THE WITNESS: I don't know. That's a  
22 question I guess, you know, we would have to poll  
23 and it would depend on someone's opinion of what is  
24 a Christian, what is not a Christian versus Muslims.  
25 I would think that -- again, it would be speculation

1 on my part, but, typically, you would probably have  
2 more people participating in Christian activities  
3 than would Islamic activities or Jewish activities,  
4 whatever.

5 BY MS. HERZFELD:

6 Q. Do you know of any specific diets that  
7 followers of the Christian faith follow?

8 A. No. Not any specific diet, no.

9 Q. Have you ever determined that a facility  
10 housing TDOC inmates did not offer Halal foods for  
11 inmates during the two feasts that we just talked  
12 about in this policy?

13 A. Repeat that question, please. I'm sorry.  
14 It broke up.

15 Q. Sure. Have you had a circumstance where  
16 you've been made aware of a facility that houses  
17 TDOC inmates that has not provided the feasts that  
18 we just talked about in this policy?

19 A. No, I have not.

20 Q. Okay. And we'll move over to the next  
21 policy. And there is Exhibit 2.

22 MS. HERZFELD: Janie, I should have said  
23 before that the other one was Exhibit 1.

24 (WHEREUPON, the  
25 previously-mentioned document was

1 marked as Exhibit Number 1.)

2 MS. HERZFELD: And this will be Exhibit 2.

3 (WHEREUPON, the

4 previously-mentioned document was

5 marked as Exhibit Number 2.)

6 BY MS. HERZFELD:

7 Q. This is the same policy, 116.08, effective  
8 date of September 30, 2019; do you see that, sir?

9 A. I do.

10 Q. This one is approved by -- is that you?

11 A. That's correct.

12 Q. Okay. Great. I'll submit to you that  
13 this is the updated policy. See where it says  
14 supersedes just to the right? See where I'm at?

15 A. Yes.

16 Q. This one is for religions diet program; is  
17 that right?

18 A. That's correct.

19 Q. And the effective date is September 30,  
20 2019?

21 A. Yes.

22 Q. Do you know why this policy was updated or  
23 what changes were made to it?

24 A. Our policies are reviewed throughout the  
25 year and every year. Our policies, we update those

1 on a three-year cycle, so it's not uncommon to have  
2 an updated policy. As far as the changes in the  
3 policy, I do not know specifically the individual  
4 changes from a previous policy to this policy, but  
5 it's not uncommon for policies to be upgraded or  
6 modified and updated.

7 Q. And if they're updated, are they always  
8 modified or sometimes do you just refresh them with  
9 a new date with no change?

10 A. Yes. We would reissue a policy with a new  
11 effective date that had no changes. That's very  
12 possible, too.

13 Q. Do you happen to know if that was the case  
14 when this policy was updated?

15 A. I do not know specifically, no.

16 MS. HERZFELD: Next will be Exhibit 3.

17 (WHEREUPON, the  
18 previously-mentioned document was  
19 marked as Exhibit Number 3.)

20 BY MS. HERZFELD:

21 Q. I'll give you control of the screen so you  
22 can take a look at Exhibit 3. Let me know when  
23 you've had time. It's a collective exhibit. We've  
24 put a couple of things together and made it one  
25 exhibit just for ease of use.

1           Mr. Parker, let me know when you have had  
2 an opportunity to read them.

3           A.     Okay. Thank you.

4           Q.     Uh-huh.

5           A.     Okay. I've read it.

6           Q.     Great. And these memos generally talk  
7 about Ramadan guidelines; is that correct?

8           A.     That's correct.

9           Q.     In looking at the second memo -- we'll  
10 take control back over, if that's okay.

11                  The second memo is to institutional  
12 wardens, chaplains and food service supervisors from  
13 Ed Welch, and Bobby Straughter. Do you know who  
14 those individuals are?

15           A.     I do.

16           Q.     Who are they?

17           A.     So Ed Welch, at the time was the assistant  
18 commissioner of rehab services. Bobby Straughter  
19 was the assistant commissioner of operational  
20 support for the Department of Corrections. Both of  
21 those are Department of Corrections employees.

22           Q.     Are they responsible for compliance with  
23 religious requirements at the facility?

24           A.     Yeah. Ed Welch, at the time, was the AC  
25 of rehab services who supervises the religious

1 services programs for the Department.

2 Q. So religious services comes under the  
3 rehab services umbrella?

4 A. Yes.

5 Q. Great. Do you see that second memo there  
6 that we were just looking at that is dated March 19,  
7 2018?

8 A. Yes.

9 Q. Okay. If you see item two in that memo  
10 there, I'm pointing to it like you can see it, but  
11 you can't. But if you look at number two right  
12 there, All food items will be prepared through the  
13 food services vendors e.g. Aramark/Trinity at each  
14 institution. No outside food items will be allowed  
15 from certified volunteers. Did I read that  
16 correctly?

17 A. Yes.

18 Q. Do you know if that has always been TDOC  
19 policy or if it was new in 2018?

20 A. I'm not sure. I don't know.

21 Q. Okay. When it says, no outside food items  
22 will be allowed from certified volunteers, do you  
23 know what that means?

24 A. So that would mean that -- my  
25 interpretation of that would be that the food

1 service vendor would be preparing the meal and  
2 therefore no certified volunteer could bring in  
3 anything additional for the meal, or I guess  
4 providing meal in lieu of the food service vendor  
5 providing a meal.

6 Q. Okay. We will move now to Exhibit Number  
7 4.

8 (WHEREUPON, the  
9 previously-mentioned document was  
10 marked as Exhibit Number 4.)

11 BY MS. HERZFELD:

12 Q. Do you know who Jon Shonebarger is?

13 A. I do not.

14 Q. Have you ever seen this document before,  
15 an affidavit from Mr. Shonebarger?

16 A. I have not.

17 Q. If you will turn with me, go down just a  
18 little bit. It says here that Mr. Shonebarger, if  
19 you look at Number 3, was -- is the chaplain at  
20 Trousdale, working for CoreCivic. Does that refresh  
21 your memory as to who he might be?

22 A. I don't know him personally. I don't know  
23 him in his role as chaplain, but according to this  
24 document, it says he's the chaplain there at  
25 CoreCivic. I have no reason to doubt that.

1 Q. And you've never had any conversation with  
2 Mr. Shonebarger to your knowledge?

3 A. No.

4 Q. If you will go with me to paragraph 8. So  
5 Mr. Shonebarger here says, if you'll read along with  
6 me, In 2018, TDOC and CoreCivic policy was changed  
7 to disallow food items to be brought in by  
8 volunteers, period. The change was made in response  
9 to complaints of some religious groups, i.e.  
10 Christians, receiving more food at feasts due to a  
11 higher number of volunteers in the area bringing in  
12 food, while other religions, with fewer or no  
13 volunteers in the area were not receiving the same  
14 amount of extra food. The authorized vendor at TTCC  
15 and for all CoreCivic prisons in Tennessee is  
16 Trinity. Did I read that correctly?

17 A. Yes.

18 Q. Do you have any knowledge of a change in  
19 TDOC or CoreCivic policy to disallow foods being  
20 brought in from volunteers?

21 A. No, I do not.

22 Q. Do you know of a time when food was  
23 allowed to be brought in by volunteers?

24 A. I would say that years ago. Okay. And I  
25 don't remember how long ago, but at the time in west



1 Tennessee, it would make sense to me that if the  
2 vendor -- if the food service vendor could not  
3 prepare the meal, the appropriate meal for the  
4 holiday or whatever the case might be, that we  
5 could -- we had the option of using a certified  
6 volunteer to provide services to assist for that.

7 But, again, if the vendor, the food  
8 service vendor, i.e. for us, would be Aramark. If  
9 they would provide the meal, then certainly we would  
10 rather have them provide the meal than having a  
11 vendor bring it in from the outside.

12 Q. Okay. Do you know how one becomes a  
13 certified volunteer?

14 A. Sorry?

15 Q. Do you know how one becomes a certified  
16 volunteer?

17 A. There is a process where they apply to be  
18 a certified volunteer. There is a background check,  
19 there's some requirements that have to be met.  
20 They're approved through the director of religious  
21 services, the assistant commissioner of rehab  
22 services, you know, and the -- we have a policy on  
23 that relating to certified volunteers for the  
24 Department.

25 Q. And before this time when there was this

1 change in policy, did you have to be a certified  
2 volunteer to donate food to the facility or could  
3 any volunteer do that?

4 A. I don't remember specifically. In most  
5 cases, people who brought in or assisted with these  
6 services would have been certified volunteers with  
7 the Department.

8 Q. Okay. If you'll look with me at paragraph  
9 9. Therefore in 2018, to ensure fairness and equal  
10 treatment to all religions, all outside foods were  
11 prohibited including religious items provided by  
12 volunteers. Did I read that correctly?

13 A. Correct.

14 Q. Do you recall there being complaints from  
15 Muslim prisoners that they weren't receiving the  
16 same types of -- the same types of meals and foods  
17 being donated as Christian prisoners?

18 A. I don't remember any specific complaints  
19 related to that. No, I do not.

20 Q. Okay. If you'll go down with me to  
21 paragraph 10. Food service and religious staff at  
22 TTCC work to ensure that Muslim inmates receive  
23 meals during Ramadan before sunrise and after  
24 sunset, which do not conflict with their religious  
25 requirements. Do you know anything about that?

1 A. I do not.

2 Q. Okay. Number 11. Muslim inmates have  
3 available to them Halal food items. Do you have any  
4 knowledge about that?

5 MR. AUMANN: Objection to form. You can  
6 go ahead.

7 THE WITNESS: No, I mean, that's his  
8 statement. I don't know any details about that, no.

9 BY MS. HERZFELD:

10 Q. Do you know if it's true or not at  
11 Trousdale?

12 A. I do not.

13 Q. Okay. Number 12, Muslim inmates have  
14 available during Ramadan vegetarian options provided  
15 before sunrise and after sunset. Did I read that  
16 correctly?

17 A. Yes, you did.

18 Q. Do you have any personal knowledge whether  
19 or not that's true at Trousdale?

20 A. I do not.

21 Q. Do you know if Halal meals incorporate  
22 meat and not just vegetables?

23 A. I do not.

24 Q. Okay. Do you know if TDOC consulted with  
25 any religious leaders, elders or Muslims about

1 providing only vegetarian foods to Muslims during  
2 Ramadan?

3 A. I do not. Again, it's possible that they  
4 could have consulted with resources, but the  
5 specifics of that, I would not have knowledge of or  
6 I don't have knowledge of.

7 Q. Okay. If you go down to number 13, do you  
8 see where it says, All food items must be purchased  
9 and provided by authorized vendors. Volunteers  
10 cannot bring in outside food. This is a policy  
11 which applies equally to all inmates of all  
12 religious faiths at TTCC. See that?

13 A. I do.

14 Q. Do you know if that's still TDOC's policy?

15 MR. AUMANN: Objection to form. You can  
16 go ahead.

17 THE WITNESS: As far as I know, that's  
18 still the policy, yes.

19 BY MS. HERZFELD:

20 Q. Okay. Do you know anything about care  
21 packages being received at Trousdale?

22 A. Care packages?

23 Q. Yes, sir.

24 A. Define care packages.

25 Q. Do you know if people are allowed to drop

1 off gifts or packages for prisoners at Trousdale?

2 A. Not that I'm aware of.

3 Q. Would it be appropriate if people were  
4 allowed to do that?

5 A. So I guess my -- I would have a question  
6 for you. I would need you to define what a care  
7 package is specifically, what you're referring to as  
8 a care package or give me an example.

9 Q. Why don't I back it up. So if someone  
10 wanted to drop off literature for each prisoner at  
11 Trousdale, is that something that would be okay, to  
12 your knowledge?

13 A. Drop off literature?

14 Q. Yes, sir.

15 A. No. Normally people don't come to a  
16 facility and just drop off an item for an inmate.  
17 That's not -- that would not be appropriate, if  
18 that's what you're referring to.

19 Q. Yeah. I think maybe what I'm referring  
20 more to is like if there was a group, like if my  
21 church wanted to, you know, we've got some prayer  
22 material and pamphlets and we're trying to reach  
23 more people and my church group wanted to bring by  
24 some pamphlets that, you know, talk about the types  
25 of prayers that, you know, we would like to engage

1 in with various prisoners and we wanted to drop that  
2 off for all prisoners to see if anyone was  
3 interested, is that something that that group could  
4 communicate with prisoners in the facility through  
5 doing that?

6 A. I would have to look at the policies  
7 related to that. We would -- again, any kind of  
8 request, special requests, things like that, they  
9 have to go through the chaplain. The chaplain would  
10 have to consult with the warden, the leadership of  
11 the facility, and then we have a -- TDOC would have  
12 a director of religious services who would filter  
13 and review any kind of special request like that.  
14 It would be reviewed at that level with the warden  
15 and...

16 Q. Okay.

17 A. As well as the leadership for the  
18 Department as far as the assistant commissioner of  
19 rehab services and the religious services committee,  
20 things like that.

21 Q. Okay. What about if I have like a mom's  
22 group and my mom's group decided that we were going  
23 to make cookies and wanted to give cookies to  
24 everyone at the facility. What would be the  
25 procedure that, you know, my group of moms, you

1 know, moms who love cookies, could bring cookies to  
2 the prison to be distributed to the prisoners?

3 A. That would be a problem there, because  
4 you're talking about a food service item that would  
5 be coming in that, I'm assuming you're not a  
6 certified volunteer, it's just somebody that's going  
7 to bring in items that we don't know what is  
8 contained in the items, so that would be an issue, a  
9 problem.

10 Q. Okay. What if my mom's group wanted to go  
11 and buy a bunch of Girl Scout cookies. We've got,  
12 you know, 25 boxes of Girl Scout cookies we want to  
13 donate to prisoners. Could we just talk to somebody  
14 and, you know donate those boxes of cookies?

15 A. That would be unusual. That would be a  
16 real unusual request for such, and, again, you know,  
17 I've always been, as commissioner, I would say we  
18 would look at people who wanted to help inmates or  
19 help facility inmate activities, whether it be  
20 religious or rehabilitation in nature, to review the  
21 intent and also review the security issues that  
22 might go along with that particular question.

23 Again, if we're talking about an issue  
24 related to religious services, that would have to be  
25 filtered through the chaplain, through the warden,

1 through the director of religious services. There's  
2 several review processes that would have to take  
3 place before anything like that would be approved.

4 Q. Okay. And even if the chaplain or someone  
5 approved, say cookies coming in from my Bible study  
6 group to give to prisoners, that would seem like  
7 that's in conflict with the TDOC policy we just read  
8 about that talks about no outside food except  
9 through the vendors; is that right?

10 MR. AUMANN: Objection to form.

11 THE WITNESS: Yes, it is.

12 BY MS. HERZFELD:

13 Q. Okay. Do you know what a Khuffain is?

14 A. I'm sorry? (Court reporter asks for  
15 clarification.)

16 Q. K-H-U-F-A-I-N [sic]. Do you know what  
17 Khuffain is? Have you ever heard of that?

18 A. I do now. I understand it's some type of  
19 headdress that males wear, Islamic inmates wear. I  
20 found that out in my conversations with the  
21 attorneys in looking at the information.

22 MR. AUMANN: Just to interject,  
23 Commissioner Parker, again, the attorney-client  
24 privilege, just make sure not to reveal the contents  
25 of any discussions that you had with your attorneys.



1 BY MS. HERZFELD:

2 Q. Have you -- did you talk about perhaps or  
3 have you familiarized yourself at all with a special  
4 type of sock that Muslims wear during prayer?

5 A. I saw that in the complaint. I'm not  
6 familiar with it.

7 Q. If I submitted to you that the Khuffain  
8 would be socks that are worn during prayer, does  
9 that sound like in, and this isn't supposed to be  
10 like a memory test, does that sound like something  
11 you might have heard of?

12 A. Yes.

13 Q. Okay. Great. We'll go ahead and look at  
14 the next exhibit, which I think should be Exhibit 5.

15 (WHEREUPON, the  
16 previously-mentioned document was  
17 marked as Exhibit Number 5.)

18 BY MS. HERZFELD:

19 Q. I will submit to you that this is the TDOC  
20 Bates Number 442, and it's Policy number 504.01,  
21 with the effective date of November 1st, 2019; do  
22 you see that, Mr. Parker?

23 A. I do.

24 Q. What is the subject of this policy?

25 A. Inmate personal property.

1 MR. AUMANN: Can I just interject? I  
2 think you said Exhibit 5, but I think this is  
3 Exhibit 7 that you've got marked.

4 MS. HERZFELD: I think it's 5. (Court  
5 reporter clarifies.)

6 MR. AUMANN: I was looking at the 7 dot  
7 PDF. My mistake then. All right.

8 BY MS. HERZFELD:

9 Q. No problem. So the effective date of this  
10 policy was November 1st, 2019; is that right?

11 A. Right.

12 Q. And it was approved by you?

13 A. Yes.

14 Q. And if you'll go down with me to Section  
15 VI D, and we'll start at the beginning. See where  
16 we're at on the screen?

17 A. I do.

18 Q. So it says, By July 1st of each year the  
19 commissioner/designee will publish a list of  
20 personal property that inmates are permitted to have  
21 in their possession. This list may be revised as  
22 frequently as needed. All inmates are required to  
23 be in compliance with the approved property list.  
24 Televisions, radios, tape players, typewriters,  
25 stands and musical instruments, et cetera, et

1 cetera.

2 Do you see where I am?

3 A. Yes, I do.

4 Q. And did I read that correctly?

5 A. You did.

6 Q. Do you know how that list of personal  
7 property items is developed every year?

8 A. Somewhat. It's generated from a review of  
9 the -- in the field, as well as the assistant  
10 commissioners for the Department.

11 Q. And do you have any personal involvement  
12 in the development of that list?

13 A. No, I do not.

14 Q. We'll move on to the next exhibit, please.

15 (WHEREUPON, the  
16 previously-mentioned document was  
17 marked as Exhibit Number 6.)

18 BY MS. HERZFELD:

19 Q. Do you recognize this document, sir?

20 A. Yes.

21 Q. What do you know it to be?

22 A. It's a memo that has my name there related  
23 to inmate religious property.

24 Q. Okay. And do you see who drafted this  
25 memo?

1           A.     I'm sorry?

2           Q.     Who drafted it, who is the author?

3           A.     It's got my name on it. I'm not sure that  
4 I drafted it or someone in the assistant  
5 commissioners office drafted it.

6           Q.     And you approved it. Are those your  
7 initials?

8           A.     That's my initial, yes.

9           Q.     What is the date?

10          A.     September 11, 2017.

11          Q.     If you will go down with me just a little  
12 bit on Page 2, there's a list of items that Muslims  
13 are permitted to own. Do you see where we're at?

14          A.     Yes.

15          Q.     It says that there's a Hijab, two, solid  
16 white head covering for female Muslims. Do you see  
17 that?

18          A.     I do.

19          Q.     And then a Kufi, two, solid white, black  
20 or gray?

21          A.     Yes.

22          Q.     Miswak sticks, up to ten sticks. Do you  
23 know what Miswak sticks are?

24          A.     Vaguely. I don't know specifically what  
25 they're used for, but I do recognize that as an item

1 for the Islamic faith group.

2 Q. And plastic prayer beads, one, solid  
3 color?

4 A. Yes.

5 Q. And then a prayer rug. Does that sound  
6 right?

7 A. That's correct.

8 Q. And then we'll go on to the next document.  
9 Exhibit 7.

10 (WHEREUPON, the  
11 previously-mentioned document was  
12 marked as Exhibit Number 7.)

13 BY MS. HERZFELD:

14 Q. Okay. You see this is a memo dated  
15 December 20, 2019 with the subject, Inmate Religious  
16 property?

17 A. Yes.

18 Q. And are you -- is this a memo from you?

19 A. It is.

20 Q. Okay. Go down to Page 2. This is for  
21 inmate religious property allowed for Muslims. Do  
22 you see that?

23 A. I do.

24 Q. Again, here we have the Hijab, Kufi,  
25 Miswak sticks, plastic prayer beads and the prayer

1 rug; is that right?

2 A. That's correct.

3 Q. You recognize these as being the same five  
4 items that were listed in the last exhibit that we  
5 looked at, the 2017 inmate religious property memo?

6 A. Yes.

7 Q. And to your knowledge, since you've been  
8 commissioner, are those the only items specific to  
9 Muslims that have been allowed per policy?

10 A. That's correct.

11 Q. If you will go with me to the next  
12 document, which I think will be Exhibit 8.

13 (WHEREUPON, the  
14 previously-mentioned document was  
15 marked as Exhibit Number 8.)

16 BY MS. HERZFELD:

17 Q. This is a collective exhibit. Starts with  
18 Bates Number CCI000642 and it goes through  
19 CCI000658. I'll let you take control so you can  
20 take a minute to look through it if you'd like.

21 A. Okay.

22 Q. Have you had an opportunity to review the  
23 document?

24 A. I've looked, scanned over it, yes.

25 Q. And would you agree that these are a

1 series of documents dealing with Mr. Pleasant-Bey's  
2 requests for religious accommodations?

3 A. Yes.

4 Q. On the very first page, if you look at  
5 that very first one, which I think you're on, we're  
6 going to take control back over, it's dated  
7 12/27/17. Do you see it there in the right-hand  
8 corner?

9 A. That's correct.

10 Q. And does this look like a letter from  
11 Mr. Pleasant-Bey, who is the plaintiff in this case?

12 A. That's correct.

13 Q. Do you see that the subject says,  
14 religious accommodation request submitted?

15 A. Yes.

16 Q. If we scroll down to the page that is  
17 Bates Stamp CCI000647, right here, do you see that  
18 under, sixth accommodation request, there's a  
19 request for Kuffain socks?

20 A. Correct.

21 Q. And Kuffain socks, you've described as  
22 leather socks?

23 A. Yes.

24 Q. Do you know anything about those leather  
25 socks being utilized during prayer?

1           A.     I do not.

2           Q.     Do you know if they're utilized any time  
3 outside of prayer?

4           A.     I do not.

5           Q.     All right. Have you been involved in  
6 discussions with anyone about whether Muslim inmates  
7 should be allowed to own or use Kuffain?

8           A.     No.

9           Q.     Do you know if Kuffain has ever been  
10 permitted at TDOC facilities?

11          A.     Not to my knowledge.

12          Q.     Okay. You've been with TDOC for how long?

13          A.     38 years.

14          Q.     And during that time, you've never known  
15 if Kuffain has been permitted for Muslim prisoners?

16          A.     That's not familiar. I didn't know what  
17 those were, so I'm not familiar with them, but I  
18 don't remember those in my time with corrections.

19          Q.     Okay. Do you know if TDOC consulted with  
20 any religious advisers who are Muslim or specialized  
21 in the Muslim faith about the importance of the  
22 Kuffain to their faith?

23          A.     I don't know if they did or not.

24          Q.     Okay. Who would know?

25          A.     More than likely the director of religious



1 services at the time would know, possibly.

2 Q. Okay. Do you see that second and third  
3 sentence on this page where it states, I was  
4 informed that the thin material used to make Kuffain  
5 could be used to make gloves to climb over a gate  
6 with. Inmates are allowed to wear leather shoes,  
7 which could be used to make a more durable pair of  
8 gloves; do you see that?

9 A. I do.

10 Q. Do you know anything about this rationale  
11 for not permitting Muslim inmates to own or wear  
12 Kuffain?

13 MR. AUMANN: Objection to form. You can  
14 go ahead.

15 THE WITNESS: I do not know anything  
16 specifically about Kuffain socks. I do know that  
17 from a security standpoint, you have to be very  
18 careful about approving or allowing any type of  
19 leather-type material like that that could be used  
20 to aid in an escape. To me, and based on my  
21 experience in security within the Corrections  
22 Department, that it's definitely something that  
23 would have to be carefully looked at and considered.

24 BY MS. HERZFELD:

25 Q. And do you know if anyone has ever done

1 that in TDOC?

2 A. In relation specifically to socks?

3 Q. Yes, sir.

4 A. I do not know.

5 Q. If you will take a look with me, we're  
6 going to go to the next exhibit, which is Exhibit 9.

7 (WHEREUPON, the  
8 previously-mentioned document was  
9 marked as Exhibit Number 9.)

10 BY MS. HERZFELD:

11 Q. Can you take a look at this for me,  
12 please, sir? Do you recognize this document? You  
13 have control so you can move it.

14 A. Okay. This is a document that is  
15 published related to inmate personal property, items  
16 that inmates are allowed to have within the  
17 Department.

18 Q. Okay. That memo is dated November 1,  
19 2019; is that right?

20 A. That is right.

21 Q. And the subject is inmate personal  
22 property?

23 A. Yes.

24 Q. And the author is Lee Dotson, that's the  
25 assistant commissioner of prisons; is that right?

1           A.     That's correct.

2           Q.     And does he work for you?

3           A.     He works for the Department, yes, as the  
4 assistant commissioner.   Yes.

5           Q.     And he reports directly to you?

6           A.     He reports directly to me through the  
7 chief of staff with the Department, yes.

8           Q.     What does this memo describe?

9           A.     Describes the personal property that  
10 inmates may have in their possession within the  
11 Department.

12          Q.     Okay.

13          A.     Within the -- the amount, also, within a  
14 6 cubic foot measurement.

15          Q.     Okay.   So I'm assuming that someone goes  
16 through and there's meetings about what is and what  
17 is not permitted?

18          A.     Yes.   This is another document or another  
19 I guess subject that's reviewed from time to time  
20 and updated or modified, if necessary.

21          Q.     Okay.   And the things that are on this  
22 list and approved, they are not considered to be  
23 security threats; is that right?

24                 MR. AUMANN:   Object --

25                 THE WITNESS:   No, unless there is an item

1 that, you know, based on an incident somewhere that  
2 we determined to be an issue or security threat.

3 BY MS. HERZFELD:

4 Q. Okay. But I don't think I quite heard  
5 your answer before, but generally the stuff that's  
6 on this list is not considered to be a security  
7 threat if it's permitted in the facility?

8 A. Generally not. That's correct.

9 Q. So if we look at the first item that's  
10 listed on this, the first thing that is listed, it  
11 says, socks; do you see that?

12 A. I do.

13 Q. And it's actually 12 pairs of socks, any  
14 combination of white and gray; do you see that?

15 A. I do.

16 Q. And socks are not considered to be, in  
17 general, a security threat?

18 A. Correct.

19 Q. And do you see the second item there, the  
20 second item listed says shoes; do you see that?  
21 Three pair?

22 A. I do.

23 Q. And within that description, it also talks  
24 about leather shoes; is that right?

25 A. That's correct.

1           Q.    And they can't have -- inmates can't have  
2 leather shoes?

3           A.    Correct.

4           Q.    And then if you see there in item eight,  
5 is a belt; is that right?

6           A.    That's correct.

7           Q.    Can inmates have leather belts?

8           A.    Correct.

9           Q.    Okay. Then item number 11, it says  
10 billfold; do you see that?

11          A.    I do.

12          Q.    Can inmates have leather billfolds?

13          A.    Yes.

14          Q.    Okay. And item 16 says, watch; do you see  
15 that?

16          A.    I do.

17          Q.    Watch and band, it actually says. Can  
18 inmates have a leather watch band?

19          A.    Yes.

20          Q.    I'll go for just a little bit longer, and  
21 then we'll take a lunch break. Does that sound  
22 okay?

23          A.    Sure.

24          Q.    Okay. Great. Do you know what the Koran  
25 is?

1 A. I do.

2 Q. What is the Koran?

3 A. Koran is a book of -- religious book, a  
4 text book that is associated with the Islamic faith  
5 that they use in their services for the practice of  
6 their faith.

7 Q. Do you know the Koran to be an important  
8 text to Muslims?

9 A. Yes.

10 Q. Have you ever become aware of a situation  
11 in which inmates at a facility were instructed that  
12 they cannot purchase the Koran, could purchase the  
13 Bible?

14 A. No.

15 Q. Okay. Did you ever hear about an incident  
16 at Trousedale where inmates were instructed that they  
17 could not purchase a Koran from Union Supply?

18 A. No.

19 Q. If there was a time inmates at Trousedale  
20 were told they could not purchase a Koran from Union  
21 Supply but they were still able to purchase a Bible  
22 From Union Supply, would that be of concern to you?

23 A. Yes.

24 Q. Would it be a violation of TDOC policy if  
25 inmates were not permitted to purchase the Koran but

1 were permitted to purchase the Bible from Union  
2 Supply?

3 MR. AUMANN: Objection to form.

4 MR. WELBORN: Same objection.

5 THE WITNESS: I would have serious  
6 concern -- I would have serious concern with the  
7 fact that if inmates were truly being denied access  
8 to the religious text, the Koran, and told they  
9 could not have access to it versus having access to  
10 the Bible.

11 BY MS. HERZFELD:

12 Q. Okay. So do you know that prisoners can  
13 purchase religious texts from Union Supply?

14 A. Correct.

15 Q. And Union Supply is an authorized vendor  
16 of TDOC; is that right?

17 A. That's right.

18 Q. And so if someone was told that they could  
19 purchase a Bible but they could not purchase a Koran  
20 from Union Supply, would that be a violation of TDOC  
21 policy?

22 MR. AUMANN: Objection. You can go ahead.

23 THE WITNESS: I would have all kinds of  
24 questions related to that. First of all, was the  
25 Koran available, and was -- what was the reason why

1 someone could not access or buy the Koran. Assuming  
2 both were available and approved items through the  
3 vendor, I would certainly want to make sure that the  
4 inmate had access to the Koran just like I would for  
5 inmates having access to the Bible.

6 BY MS. HERZFELD:

7 Q. Okay. And I understand that, but when you  
8 say "access," I'm not sure what you mean.

9 A. Access meaning that they would have the  
10 Koran available or they would have -- they could  
11 purchase the Koran. So, again, I would expect  
12 inmates to have equal access to the Koran and the  
13 Bible.

14 Q. So if there was a time when the facility  
15 was saying, you can have no access to one of those  
16 texts, that would be a violation of TDOC policy; is  
17 that right?

18 A. That's correct.

19 Q. Are facilities required to have copies of  
20 religious texts in the library and available to  
21 inmates through the chaplain?

22 A. You know, I'm not sure if we say a  
23 requirement. I do know that they have access in  
24 most cases. The chaplain's office would have access  
25 to religious texts and certainly it's very common



1 for the chaplains to have extra copies for someone  
2 who may not can afford or does not have a copy of a  
3 religious text to give to an inmate.

4 Q. Okay. And if chaplains had access to one  
5 type of religious text, you'd expect them to get  
6 access to all types of religious texts upon request  
7 of a prisoner; is that right?

8 MR. AUMANN: Objection. You can go ahead.

9 THE WITNESS: Every effort should be made  
10 to provide the inmate with religious texts.

11 BY MS. HERZFELD:

12 Q. And why is that?

13 A. Well, it's important that they have  
14 religions texts to practice their faith.

15 Q. Okay. Give me just one minute, please.

16 Okay. I think this is a good time to take  
17 a break for lunch. If we could take 45 minutes,  
18 come back at 1:00.

19 (Lunch break observed.)

20 BY MS. HERZFELD:

21 Q. Back on the record after a short lunch  
22 break.

23 Mr. Parker, do you feel okay to continue  
24 testifying?

25 A. Yes.

1           Q.     Great. And during your lunch break, did  
2 you think at all about the questions and answers  
3 that we have gone through in the morning?

4           A.     I tried not to, but...

5           Q.     Are there any of your answers you would  
6 like to change?

7           A.     No. Not that I'm aware of, no.

8           Q.     Great. So if we could go back to Exhibit  
9 Number 7, we're going to put that up on the screen.  
10 That's the 2019 inmate religious property memo. Do  
11 you see that?

12          A.     Yes.

13          Q.     Do you see where it says under all inmates  
14 on the first page, number 3 states, prayer oil,  
15 maximum of 3 ounces, must be kept in the cell at all  
16 times, and may not be taken to group gatherings.  
17 Did I read that correctly?

18          A.     Yes.

19          Q.     Then the next section is underlined,  
20 prayer, religious oil, can only be purchased from  
21 approved TDOC vendors. Oil must remain in the  
22 original bottles purchased from approved TDOC  
23 vendors. Outside oils from any other vendors are  
24 not allowed due to safety, security concerns.  
25 Outside oils may not be donated, sent in or brought

1 in by volunteers. Did I read that correctly?

2 A. Yes.

3 Q. Do you know how many TDOC approved vendors  
4 there are that sell prayer oil?

5 A. It's my understanding that the vendor that  
6 provides the oils are the Union Supply, the contract  
7 vendor that we have that provides inmate property.

8 Q. So Union Supply. Do you know if there are  
9 any other approved vendors that sell prayer oil?

10 A. Not that I'm aware of.

11 Q. Do you know if there are any other  
12 approved vendors to buy anything from TDOC or is  
13 Union Supply the only one?

14 A. Union Supply is the only one that I'm  
15 aware of.

16 Q. Okay. How does TDOC determine which  
17 vendors it approves?

18 A. So through the RFP process, through the  
19 State of Tennessee, there is a RFP and vendors can  
20 apply and respond to the RFP and that is a  
21 coordinated effort between the Department, central  
22 procurement office, the State of Tennessee, through  
23 the purchasing regulations through the State.

24 Q. Okay. Are you involved at all in that  
25 approval process?

1           A.     Not directly, no. That is, again, handled  
2 through the -- primarily through the office of the  
3 rehabilitative services with central procurement,  
4 and which is with F&A but the Department of  
5 Corrections initiates their RFP, of course, through  
6 the service, so to that extent, I would be, I guess.

7           Q.     Are you familiar with Union Supply from  
8 your time at TDOC?

9           A.     Am I familiar with what? I'm sorry. I  
10 didn't understand.

11          Q.     With Union Supply?

12          A.     Yes.

13          Q.     Do you know if there is a contract with  
14 Union Supply?

15          A.     To my understanding, there is.

16          Q.     Is that between TDOC and Union Supply?

17          A.     Yes.

18          Q.     Where can I find a copy of that contract,  
19 who would have it?

20          A.     Probably the -- Kelly Young, in the Office  
21 of Inspector General would have a copy, or CPO would  
22 have a copy of it.

23          Q.     Okay. Do you know if the contract with  
24 Union Supply is exclusive?

25          A.     I believe so. I believe it is. Again, I

1 would have to check on that to verify, but I'm  
2 pretty sure it is.

3 Q. During your time at TDOC, have you ever  
4 known any other company that inmates could purchase  
5 items from, other than Union Supply?

6 A. Yes, but it's been years ago. You know,  
7 in 38 years, I can remember before Union Supply was  
8 here, I can remember back to the time when inmates  
9 purchased from other areas of the state or other  
10 vendors, but that's been years and years ago.  
11 Primarily since I've been the assistant warden or  
12 assistant commissioner, Union Supply has had the  
13 contract for inmate property for the State.

14 Q. Do you know if Union Supply offers a range  
15 of Halal foods?

16 A. I'm not sure.

17 Q. Do you know if they offer any Halal foods?

18 A. I'm not sure.

19 Q. Are you aware that there are specific  
20 Muslim vendors that inmates could order from?

21 A. Again, the only one I'm familiar with  
22 Union Supply.

23 Q. So in other states or other jurisdictions,  
24 you don't know anything about there being specific  
25 Muslim vendors?

1           A.     I'm sure there could be, but, again, I  
2 have no personal knowledge of those.

3           Q.     Do you know if there is any Muslim-focused  
4 vendors that are approved by TDOC?

5           A.     Not that I'm aware of.

6           Q.     Are you familiar with a company called  
7 Medina?

8           A.     I've heard of them.

9           Q.     What is Medina?

10          A.     I've heard that name associated in the  
11 past with inmates, Muslim inmates, and Medina having  
12 Islamic-related things, either goods or services,  
13 but I don't remember the specifics of it. It's been  
14 so long, and I just know in my time in corrections,  
15 I've heard that name, that company, associated with  
16 Muslim inmates.

17          Q.     Okay. Do you know if Medina is a  
18 bookstore for Islamic books?

19          A.     Could be. I'm not sure.

20          Q.     Have you ever heard of something called  
21 Halalco?

22          A.     No.

23          Q.     Okay. Are Muslim women in TDOC custody  
24 permitted to wear a Hijab?

25          A.     It's -- if it's on the property list, and

1 I believe it is, they would be allowed to do that,  
2 yes.

3 Q. If you'll look at that property list here  
4 that you have in front of you, it does say, Hijab,  
5 two, solid white head covering for female Muslims;  
6 is that right?

7 A. That's correct.

8 Q. So are Hijabs considered a security threat  
9 in and of themselves?

10 A. Not for the female population there that's  
11 allowed to wear those, no.

12 Q. Do you understand that Muslim men also  
13 wear certain garments to cover themselves?

14 A. I do.

15 Q. Do you know if it's permitted to have a  
16 Muslim study class or pod in TDOC?

17 A. A Muslim study class?

18 Q. Uh-huh.

19 MR. AUMANN: Objection to form. You can  
20 go ahead.

21 THE WITNESS: Not that I'm aware of that  
22 it's prohibited. It would have to be, I'm  
23 assuming -- again, the policy related to those types  
24 of activities would have to be followed, but I don't  
25 know of anything that prohibits that.

1 BY MS. HERZFELD:

2 Q. Okay. Do you know of any garments that  
3 Muslim men are permitted to wear while in TDOC  
4 custody?

5 A. The things that's listed in the property  
6 list, the items.

7 Q. So that would be the Kufi?

8 A. Yes.

9 Q. Do you see anything else for Muslim men?

10 A. That they would wear?

11 Q. Yes, sir.

12 A. No. That's all I see.

13 Q. Okay. Have you ever been involved in any  
14 discussions about what Muslim men can or cannot wear  
15 while in TDOC custody?

16 A. None that I recall.

17 Q. Okay. Are you familiar with a group  
18 called Men of Valor?

19 A. I am, yes.

20 Q. What do you know Men of Valor to be?

21 A. It's a group of people who -- it's  
22 Christian based here in Nashville that have a  
23 service, a program, I believe it's at Riverbend, and  
24 they provide a reentry program for inmates in the  
25 state of Tennessee.



1 Q. Do you know at all about any involvement  
2 of Men of Valor at Trousedale?

3 A. They may be. I don't have any, you know,  
4 direct knowledge, specific knowledge of that. They  
5 very well may have a program there at Trousedale.  
6 I'm not sure.

7 Q. Have you ever heard of pod assignments  
8 having to do with someone's affiliation with Men of  
9 Valor?

10 A. No, I have not.

11 Q. At any facility?

12 A. No.

13 Q. Have you ever heard of housing assignments  
14 having to do with someone's affiliation with Men of  
15 Valor?

16 A. That would be -- I have not, no.

17 Q. Who would make the decision about housing  
18 assignments, who is housed together at a facility?

19 A. That would be the facility warden and the  
20 administration at that facility.

21 Q. Okay. You don't get involved at that  
22 level?

23 A. No. Not unless -- not unless -- I mean,  
24 that's a very complicated question, because you're  
25 talking about housing assignments, you know,

1 security classifications could drive housing  
2 assignments. Certain programs such as, you know,  
3 therapeutic communities, treatment communities that  
4 deal with drug and alcohol treatment could drive  
5 housing assignments. I'm not familiar with any  
6 specific religious program that would drive or  
7 mandate a particular housing assignment.

8 Q. So your official title is commissioner of  
9 corrections; is that right?

10 A. That's correct.

11 Q. So what is it that you do in your position  
12 as commissioner of corrections to ensure that all  
13 prisoners are able to exercise their religious  
14 freedom?

15 A. Well, the Department of Corrections  
16 establishes policies, basically, things that we've  
17 been talking about that are published and that we  
18 monitor and that we, through our oversight at the  
19 State level, adhere to, as well as -- and policies  
20 are established based on TCA code, it's established  
21 on ACA standards, things like that, and best  
22 practices.

23 Q. I guess my question is, you know, beyond  
24 having policies and the contract monitors, is there  
25 any --

1           A.     Hold on one second. The computer behind  
2 me is throwing a fit.

3           MS. HERZFELD: We can go off the record a  
4 minute.

5           (Off-the-record discussion held.)

6           MS. HERZFELD: Janie, could you read back  
7 my last question for me, please.

8           (Requested portion of record read.)

9 BY MS. HERZFELD:

10          Q.     Beyond having policies and contract  
11 monitors, what else do you do as the commissioner of  
12 the Department of Corrections to ensure that  
13 prisoner's religious freedoms are being protected?

14          A.     Again, monitoring our policy compliance  
15 ensuring that we have an infrastructure set up to  
16 stay current with law, with regulations, and then  
17 ensuring that there is a process of review and of  
18 adherence to those policies at both our state  
19 facilities as well as our CoreCivic facilities.

20          Q.     Have you ever intervened to solve a  
21 dispute or complaint about religious accommodations  
22 for a prisoner?

23          A.     It's possible that I could have through  
24 the grievance process or through some other process,  
25 but I don't remember any specific occurrence, but

1 it's very possible that I may have.

2 Q. Under the contract, are you able to get  
3 liquidated damages for violations of the policy  
4 regarding religious freedoms of prisoners?

5 MR. AUMANN: Objection to form. You can  
6 go ahead.

7 THE WITNESS: Yes. I mean, any of the  
8 requirements of our state policies that CoreCivic  
9 are required to adhere to and the things that we  
10 inspect at the state level through annual  
11 inspections processes, monthly inspection processes,  
12 we are able to do that.

13 BY MS. HERZFELD:

14 Q. Okay. And have you ever been -- do you  
15 have any knowledge of any time that liquidated  
16 damages were sought for violations of the policy  
17 having to do with religion?

18 A. I don't have personal knowledge of that.  
19 I don't know that it has or has not taken place, but  
20 I don't have any personal knowledge of it.

21 Q. Okay. Is the grievance process important  
22 to be able to address religious concerns for  
23 prisoners?

24 A. Yes.

25 Q. Why is that?

1           A.     If the inmates -- obviously, it's an  
2     important piece of the process and the function in  
3     corrections for inmates to have access to the  
4     grievance process to be able to bring forth issues,  
5     concerns, related to the operation or things that  
6     are allowed or not allowed or their grievances,  
7     basically, to the administration or to those that's  
8     in charge, whether that be at the warden level or at  
9     the state level.

10          Q.     Tell me everything that you do in your  
11     position as commissioner of corrections to oversee  
12     the director of religious services.

13          A.     Well, through the organizational chart, so  
14     you have the commissioner at the top of the chart,  
15     then you have your -- the people who work under the  
16     commissioner's authority. We have 6,400 staff that  
17     works in this department, and you have assistant  
18     commissioners, you have deputy commissioners, you  
19     have directors, so at that director level, the  
20     director of religious services, they work directly  
21     for the assistant commissioner of rehab services who  
22     answers directly to the chief of staff and  
23     through -- up through the commissioners, so we have  
24     processes in place where, you know, we work  
25     together. They work under my authority as

1 commissioner through the Department.

2 Q. So if I understood that correctly, you  
3 supervise someone who directly supervises someone  
4 who directly supervises the director of religious  
5 services; is that right?

6 A. That's correct.

7 Q. Okay. So would you ever have any personal  
8 involvement with overseeing the director of  
9 religious services?

10 A. No, not normally. I would not, no.

11 Q. Have you ever known about any time that  
12 the director of religious services position has been  
13 reprimanded?

14 A. No.

15 Q. What about any concerns with performance  
16 for the director of religious services, whoever it  
17 may be?

18 A. None that I can remember or aware of.

19 Q. Have you ever heard about anybody making a  
20 determination or having a concern that TDOC was not  
21 providing enough oversight concerning religious  
22 accommodations for prisoners?

23 A. No.

24 Q. Has there ever been any lawsuit that  
25 you're aware of having to do with religious services

1 finding TDOC at fault?

2 A. Not that I'm aware of or that I can  
3 remember.

4 Q. Do you know if TDOC has ever settled a  
5 case for religious accommodations with any prisoners  
6 through your tenure?

7 A. I don't know. Not that I'm aware of or  
8 that I can remember.

9 Q. Okay. I'm going to show you the next  
10 document, which is Exhibit 1.

11 MS. HERZFELD: This is TDOC 000324, is the  
12 beginning page. It's policy 501.01 dated May 1,  
13 2018.

14 (WHEREUPON, the  
15 previously-mentioned document was  
16 marked as Exhibit Number 10.)

17 BY MS. HERZFELD:

18 Q. Do you see that?

19 A. I do.

20 Q. Did you approve of this policy?

21 A. Yes.

22 Q. And the subject of this policy -- can you  
23 see the subject matter of this policy?

24 A. Inmate grievance procedures, I'm sorry.

25 Q. That's okay. What is your role in inmate

1 grievance procedures?

2 A. My role is limited, other than we have --  
3 I have a designee that reviews inmate grievances at  
4 the final appeal stage for the Department.

5 Q. Who is that designee?

6 A. It's the assistant commissioner of prisons  
7 is who does that, in that shop.

8 Q. Who is that person?

9 A. Lee Dotson.

10 Q. Lee Dotson. Do you agree that grievances  
11 are an important part of the process in managing  
12 prisons?

13 A. Yes.

14 Q. Why is it important to have effective  
15 grievance procedures for prisoners?

16 A. Again, it gives the inmate population a  
17 way to formally bring forth complaints or concerns  
18 related to their -- to all things related to their  
19 being in facilities as well as services provided or  
20 not provided.

21 Q. Can you think of any risks that would  
22 occur if you didn't have an effective grievance  
23 procedure, what problems that could cause?

24 A. Yeah, I mean, grievances are an  
25 established standard in corrections, best practice.



1 That is recognized through ACA standards, as well as  
2 other standards. I mean, inmate grievance  
3 procedures have been around a long time.

4 Q. If you didn't have them, what kind of  
5 problems do you think that might cause?

6 A. Well, it would obviously cause serious  
7 issues with the population where there is not a  
8 formal mechanism for inmates to bring concern, as  
9 well as a review of a process to try to resolve  
10 issues at the lowest level and to make sure that,  
11 you know, there is an appeal process, where it's not  
12 only always just one opinion. It's reviewed at  
13 different levels to ensure that the most appropriate  
14 response is provided for inmate grievances.

15 Q. Would you say that the inmate grievance  
16 procedure allows you to kind of have a window, eyes  
17 and ears as to what's going on in that facility?

18 A. Somewhat, yes.

19 Q. And if you didn't have an effective  
20 grievance process, would you be concerned that  
21 there's perhaps violations going on in a facility  
22 that you wouldn't know about up in Nashville?

23 MR. AUMANN: Objection. Form. You can go  
24 ahead.

25 THE WITNESS: So, again, the inmate

1 grievance process and procedures are critical to  
2 TDOC, to any state corrections agency. Inmate  
3 grievance procedures, the inmate grievance process  
4 had to be in place for the operation of a  
5 corrections department.

6 BY MS. HERZFELD:

7 Q. And have you reviewed at all the  
8 compliance of the appropriate grievance procedure  
9 for Trousdale since you've been commissioner?

10 A. I'm sorry. Repeat the first part of that?

11 Q. Sure. Have you reviewed at all  
12 Trousdale's compliance with TDOC grievance  
13 procedures since you've been commissioner of TDOC?

14 A. I have not specifically, no.

15 Q. Have you had any conversations with anyone  
16 about noncompliance of appropriate grievance  
17 procedures at Trousdale?

18 A. I have not.

19 Q. If someone told you that a facility's  
20 grievance process had never been in compliance with  
21 TDOC policies, would that concern you?

22 A. It would.

23 Q. So if someone told you that Trousdale's  
24 grievance policies and procedures have never been in  
25 compliance with TDOC policies for grievances, would

1 that be concerning to you?

2 MR. AUMANN: Object to the form.

3 BY MS. HERZFELD:

4 Q. What would you do if you received such  
5 information in response?

6 A. I would go to the compliance section of  
7 the Department, the IG department and speak to him  
8 about the process to find out why and for what  
9 reason or what area they're not in compliance,  
10 regardless, if it was a state facility or a  
11 CoreCivic facility.

12 Q. Would you consider that to be a serious  
13 concern?

14 A. Yes. Again, it would be a concern, and I  
15 would want to know the specifics of the grievance  
16 issue and why they were not in compliance and what  
17 area they were not in compliance with.

18 Q. Okay. If you'll take a look back at the  
19 screen. If you look under definition, on Page 1,  
20 see there's an explanation of calendar days there?

21 A. Yes.

22 Q. Do you see that it refers to a triggering  
23 event in that explanation?

24 A. Yes.

25 Q. What is a triggering event?

1           A.     So the triggering event would be the issue  
2     at hand or the allegation made for a particular time  
3     and place and date.

4           Q.     What if the grievance is something that is  
5     broken, do you have seven days to grieve it from the  
6     date that it broke, or would it be seven days from  
7     the date that you discovered it? How would the  
8     triggering event come into play there?

9           MR. AUMANN:  Objection.  Form.  You can go  
10    ahead.

11           THE WITNESS:  So I think that -- let me  
12    read this.

13    BY MS. HERZFELD:

14           Q.     Sure.  Take your time.

15           A.     So the triggering event would be the date  
16    the event occurred or whatever the issue occurred  
17    on.  Did that answer your question?

18           Q.     Sort of.  So say an inmate is saying, hey,  
19    this shower is broken, I want to grieve the fact  
20    that the shower is broken.  What would be the  
21    triggering event day to make it appropriate for a  
22    grievance?

23           A.     So the day that the inmate knew that the  
24    shower was broken, then whatever -- he would -- I'm  
25    assuming he would file a grievance that day or the

1 next day, that would be the triggering event.

2 Q. Okay. Very good.

3 A. He couldn't wait a month, two months,  
4 and -- to address the issue, you know.

5 Q. Okay. So it would be when he discovers  
6 it, not necessarily when it broke?

7 A. Yes.

8 Q. Okay. If you look at Page 2, look at  
9 Section VI, C1, do you see the grievance review  
10 process described there?

11 MR. AUMANN: Tricia, could you share that  
12 exhibit in the chat for us?

13 MS. HERZFELD: Sure.

14 THE WITNESS: I see the first level, the  
15 grievance review process, yes.

16 BY MS. HERZFELD:

17 Q. Do you see the second paragraph on Page 3?  
18 It states, All copies of the form must be legible  
19 and intact. Grievance forms which are improperly  
20 completed or contain insufficient information for  
21 processing shall be returned to the inmate with  
22 instructions as to proper completion. It should not  
23 be logged as received, which starts the deadline  
24 times running until the corrected version is  
25 submitted; do you see that?

1 A. I do.

2 Q. What does that last sentence mean?

3 A. So the time limit should not be held  
4 against the offender, you should send it back and  
5 the individual should have an opportunity to  
6 resubmit the corrected version.

7 Q. To make sure that it's correct?

8 A. Yes.

9 Q. Okay. And where are grievances logged at?

10 A. They are logged usually with the grievance  
11 chair in their office, the grievance chairperson,  
12 when they come in, and also in -- I believe they're  
13 logged in the computer system, also.

14 Q. In the computer system, you mean TOMIS?

15 A. Yes.

16 Q. And why are grievances logged, why does  
17 that practice occur?

18 A. Well, to keep track of them, to keep a  
19 perpetual record of the grievance.

20 Q. And why is that important?

21 A. It's important to maintain the integrity  
22 of the process and to record the grievances.

23 Q. Why is it important to log the grievances?  
24 Is it important from a TDOC standpoint?

25 A. Well, again, to properly track the

1 grievance in regard to policy requirements for time  
2 lines, whether it's a five-day turnaround or a  
3 seven-day response or a 30-day response time.  
4 Tracking the grievances at each level and the dates  
5 are important to maintain that process.

6 Q. Does that help to keep the facility  
7 accountable to answer any complaints that are coming  
8 in from prisoners?

9 A. Yes, somewhat. But, again, for the  
10 grievance process, it's laid out, there's timelines  
11 and deadlines associated with the filing of  
12 grievances of the response to grievances. It's  
13 critical that you have a way to track, to log and to  
14 track the grievance as it goes through the process.

15 Q. And why are those timelines critical,  
16 tracking those timelines?

17 A. Just like I just said, if you're following  
18 the policy in relation to the timelines and the  
19 requirements of timelines for the policy, you want  
20 to make sure that you have an accurate record of  
21 when the forms are received, how long did it take to  
22 get a response from the initial grievance, what was  
23 the response time for the hearing, things like that.

24 Q. And that would be for a bunch of reasons,  
25 right, because that's the policy, you need to follow

1 it, right?

2 A. Yes.

3 Q. And also because prisoners have to go  
4 through a certain grievance procedure for certain  
5 claims if they're going to file a lawsuit; is that  
6 right?

7 A. Yes. That is the grievance process that  
8 they follow, yes.

9 Q. So if you will continue looking at this  
10 paragraph here, it states that if a grievance is  
11 improperly completed, contains insufficient  
12 information, the grievance is returned with the  
13 inmate with instructions to complete the grievance;  
14 is that right? Hand it back, redo it, give it back  
15 to us.

16 A. Correct.

17 Q. Are you aware of any instances in which a  
18 prisoner has submitted an incomplete grievance but  
19 the grievance has not been returned to the prisoner  
20 with instructions to complete it?

21 A. No.

22 Q. Is failure to return a grievance to the  
23 prisoner with instructions as to proper completion a  
24 violation of TDOC policy?

25 A. Yes.



1 Q. If you turn with me to Page 4, look at  
2 item 6, paragraph H, matters inappropriate to the  
3 grievance procedure; do you see where I'm at?

4 A. I do.

5 Q. Then listed under section H, there's a  
6 list of items that are inappropriate for the  
7 grievance process; is that right?

8 A. That's right.

9 Q. I want to explore that a little bit so I  
10 can understand what's grievable and what's not,  
11 okay? Are safety concerns appropriate for the  
12 grievance process?

13 A. I'm sorry, would you ask that again?

14 Q. Sure. Are safety concerns appropriate for  
15 the grievance process?

16 A. Yes.

17 Q. Okay. What about concerns about level of  
18 staffing, is that appropriate for the grievance  
19 process?

20 A. Yes. I would think so, yes.

21 Q. Do you see here that it mentions  
22 inappropriate grievance notification, number CR  
23 3689?

24 A. I do.

25 Q. What is that?

1           A.     That's a document that is used for  
2 notification of an inappropriate grievance.

3           Q.     We'll go to the next exhibit, which I  
4 think should now be Exhibit 11.

5                         (WHEREUPON, the  
6                         previously-mentioned document was  
7                         marked as Exhibit Number 11.)

8 BY MS. HERZFELD:

9           Q.     It's marked TDOC 000438, title, Tennessee  
10 Department of Corrections, inappropriate grievance  
11 notification. Did I read that correctly?

12          A.     Yes.

13          Q.     Do you recognize this document?

14          A.     I do.

15          Q.     Is that the inappropriate grievance  
16 notification that was referenced in the previous  
17 exhibit?

18          A.     Yes.

19          Q.     So when we were speaking earlier, we  
20 talked about the fact that insufficiently complete  
21 grievances are not logged; that's right, right?

22          A.     Correct.

23          Q.     How about grievances that are considered  
24 inappropriate for the grievance process, are those  
25 logged somewhere?

1           A.     Again, I would have to review the policy,  
2     but I'm thinking that they are brought in and they  
3     could be logged and flagged as inappropriate and  
4     this response would go back to the offender making  
5     them aware that's it's not appropriate. Again, I  
6     would have to go back and look at the policy  
7     specifically.

8           Q.     So let's go back to the previous exhibit  
9     and take a look at that policy. I'll give you  
10    control so you can take a look at it, and maybe you  
11    could direct me to where, if anywhere, it talks  
12    about logging inappropriate grievances.

13          A.     Well, now that I think about it, an inmate  
14    grievance -- a grievance that's inappropriate for  
15    the process, I don't know that it would be  
16    considered grievance, but let me look at this and  
17    see.

18          Q.     Take your time.

19          A.     I don't see where it says that they're to  
20    be logged, so I'm assuming not then. With the  
21    notification that's sent back to the inmate, it may  
22    be that they're not required to be logged. I'm not  
23    sure.

24          Q.     Okay. So when you say you're not sure if  
25    they're required to be logged, you don't know if

1 they'd be required to be logged with the grievance  
2 coordinator or entered into TOMIS; is that right?

3 A. That's correct.

4 Q. Do you know if an inmate can appeal the  
5 decision if they get something saying it's an  
6 inappropriate grievance, inappropriate subject  
7 matter for a grievance, if they can appeal that?

8 A. Yes, I believe they can.

9 Q. Okay. And do you know if they have to  
10 appeal it, are they required to?

11 A. No, I don't think they are required to.

12 MR. AUMANN: Objection.

13 THE WITNESS: And I answer that question  
14 based on, you know, what I can remember as -- from  
15 being a warden and answering or looking at  
16 grievances that had previously been determined to be  
17 inappropriate for the grievance process. I know I  
18 used to review those from the grievance chairperson  
19 just to make sure that I agreed with their  
20 determination.

21 BY MS. HERZFELD:

22 Q. Okay. Do you know how a prisoner would  
23 appeal a notification of an inappropriate grievance?

24 A. I don't recall. I do -- like I said, I do  
25 remember in the past reviewing those to ensure that

1 the chairperson's designation of an inappropriate  
2 grievance was correct, but I can't remember the  
3 details of the procedure.

4 Q. Okay. This is the grievance policy that  
5 you have in front of you; is that right?

6 A. Correct.

7 Q. Could you take a look at it again and tell  
8 me if it tells you how it is that one would appeal a  
9 designation that something is an inappropriate  
10 grievance?

11 A. So it says that if the chairperson  
12 determines a matter to be non-grievable, the  
13 grievant may appeal that decision as outlined in  
14 handbook TDOC inmate grievance procedures.

15 Q. Are you familiar with that handbook?

16 A. Somewhat.

17 Q. Before we get to the handbook, while we're  
18 still on the matter of this policy, do you know if a  
19 prisoner were to appeal a notification of  
20 inappropriate grievance, if that appeal is required  
21 to be logged somewhere?

22 A. I'm not sure.

23 Q. I'll let you take some time to look at  
24 this policy and you can let me know if it indicates  
25 in here whether there's a requirement that an appeal

1 of a notification of non-grievable is required to be  
2 logged anywhere. Take your time.

3 A. I don't see anything.

4 Q. Okay. Let me know when you're done and  
5 we'll take over the screen again.

6 A. You can take it back over.

7 Q. So next I'll show you what I think is  
8 Exhibit 12.

9 (WHEREUPON, the  
10 previously-mentioned document was  
11 marked as Exhibit Number 12.)

12 BY MS. HERZFELD:

13 Q. This document is titled TDOC inmate  
14 grievance procedures. Have you seen this document  
15 before?

16 A. It's possible that I have, yes.

17 Q. Do you recognize this as being the inmate  
18 grievance procedures handbook?

19 A. Yes.

20 Q. I'll go ahead and let you take over the  
21 screen and take a look at that and perhaps you can  
22 tell me if it says anywhere in this handbook if or  
23 how one would go about appealing a notification that  
24 something is not grievable. You can take your time.

25 A. Again, I would say that I don't see

1 where -- anything that addresses specifically the  
2 appeal process for how it's logged for a grievance  
3 that's determined to be inappropriate for the  
4 grievance process. And I would want to check  
5 further, I guess with -- to get clarification where  
6 when it says, all grievances are logged, if that  
7 included even those that were determined to be  
8 inappropriate, so I don't know. I'm not sure about  
9 that.

10 Q. Okay. But I guess that's my question  
11 because you're the commissioner of the Department of  
12 Corrections, and we've read through these, so, I  
13 mean, my question is, if something is rejected for  
14 being inappropriate to grieve, I think your  
15 testimony before was you didn't see a requirement  
16 that it be logged. So my question is, does the  
17 Department log those or does it not?

18 A. I don't know.

19 Q. And appeal of denial of a grievance  
20 because it was inappropriate to grieve, I'm assuming  
21 you don't know if those are required to be logged or  
22 not either?

23 A. Correct. I would have to talk and check  
24 with some people and look at some more documents.

25 Q. Okay. What about whether or not an appeal

1 of a notification that a grievance is inappropriate  
2 to grieve, if that is required to exhaust someone's  
3 administrative remedies; do you know the answer to  
4 that?

5 A. I'm assuming that items that have been  
6 identified as inappropriate for the grievance  
7 process, once the form, the notification has been  
8 returned to the inmate, again, I'm not sure that  
9 there's any other review of that decision.

10 Q. Okay. So I want to make sure -- I guess I  
11 didn't really quite understand your answer there.  
12 So I'm trying to figure out, in looking at this TDOC  
13 policy and inmate grievance handbook, if someone  
14 gets a grievance returned that says this is  
15 inappropriate to grieve, is there a required  
16 additional process in order to exhaust that issue?

17 MR. AUMANN: Objection to form.

18 THE WITNESS: I don't see anything that is  
19 written here that I've seen today that would  
20 indicate so.

21 BY MS. HERZFELD:

22 Q. Okay. Great. Thanks so much. Have you  
23 ever heard any complaints specifically about the  
24 grievance process at Trousdale?

25 A. No, I have not.



1 Q. Do you ever speak to prisoners directly in  
2 your role as commissioner of Department Of  
3 Corrections?

4 A. I do.

5 Q. Okay. In what context?

6 A. During visits at the facilities primarily  
7 now.

8 Q. Okay. How often would you say that you're  
9 in contact with prisoners directly in speaking with  
10 them?

11 A. Well, over the last year, it's been very  
12 seldom, because our visits and our contact in the  
13 facilities have been somewhat limited with COVID.  
14 But on a normal year, normal basis, I usually try to  
15 get out once or twice, three times maybe, and visit  
16 the facilities in the state.

17 Q. Have you ever heard any prisoners talking  
18 about how their grievances aren't answered?

19 A. I have heard complaints from my -- again,  
20 38 years in corrections, it's -- I have heard  
21 complaints about an inmate who was dissatisfied with  
22 a grievance decision. You know, that's a common --  
23 one of the common things I used to hear as a warden  
24 from time to time but nothing specifically that I  
25 can recall in relation to Trousdale, as far as

1 inmate grievances.

2 Q. Okay. Is part of your position as  
3 commissioner of TDOC, are you involved in audits  
4 from time to time?

5 A. My involvement in the audit process is to  
6 ensure that we have a process of audit for  
7 compliance through the IG's office and that that is  
8 an ongoing process. That pretty much extends my  
9 participation in the audit process, other than the  
10 review of any types of appeals that I might see or  
11 that we may have final say so as a Department  
12 regarding liquidated damages.

13 Q. And explain to me what you mean by an  
14 audit that would have to deal with liquidated  
15 damages. I think I probably just don't understand  
16 that. Could you explain it to me?

17 A. Again, when you say "audit," I'm talking  
18 about an annual inspection process or the ongoing  
19 audit process that our compliance people at the  
20 CoreCivic facilities do with any vendor, not just  
21 CoreCivic, but with our food service vendors or  
22 others, where there's an issue of noncompliance  
23 that's found during the audit and the issue of  
24 noncompliance may not have been resolved and there  
25 would be a need or a requirement for liquidated

1 damages.

2 Q. Okay. And you said there's annual audits,  
3 is that for certification?

4 A. No. We have an annual inspection process  
5 for policy that we do in the Department of  
6 Corrections, but, again, compliance, audit  
7 compliance is an ongoing process with our vendors  
8 that we have contracts with.

9 Q. Okay. I'm going to show you what I think  
10 we've marked as Exhibit 12. (Court reporter  
11 clarifies.)

12 (WHEREUPON, the  
13 previously-mentioned document was  
14 marked as Exhibit Number 13.)

15 (Off-the-record discussion held.)

16 BY MS. HERZFELD:

17 Q. So back on the record. Mr. Parker, do you  
18 see this document TDOC003537?

19 A. I do.

20 Q. The document that we have in front of you  
21 as Exhibit 13?

22 A. Yes.

23 Q. Do you see that the date is August 3,  
24 2020?

25 A. Yes.

1 Q. The subject says TTCC compliance audit  
2 final summary. Do you see where I'm at?

3 A. I do.

4 Q. Do you know TTCC to be an abbreviation for  
5 Trousdale Correctional Facility?

6 A. That's correct.

7 Q. This is a compliance audit final summary.  
8 Have you seen this document before?

9 A. Yes.

10 Q. And is this the type of audit you were  
11 talking about, the periodic audit compliance  
12 contract?

13 A. Yes. If you could go down, this appears  
14 to be the compliance -- the annual compliance audit.  
15 I would have to look further to see to be sure.

16 Q. I think we've given you control of the  
17 document, so you can go ahead and take a look, move  
18 it along.

19 A. This would be the annual inspection  
20 process.

21 Q. Okay. If you will go with me to the page  
22 that's marked TDOC003540, so it's just a couple more  
23 down for you. That one. Go down just a little bit  
24 further. Right there. See where it says,  
25 administration VI title 6, item 5?

1 A. Yes.

2 Q. Then it says Title VI, grievance, TOMIS  
3 entries. Do you see that?

4 A. Yes.

5 Q. Then it says issue of the Title VI  
6 grievances reviewed, eight grievances filed between  
7 June 26, 2019 and September 27, 2019 did not receive  
8 a response. Five grievances filed between August 8,  
9 2019 and October 3, 2019 were responded to on  
10 November 6, 2019. Did I read that correctly?

11 A. Yes.

12 Q. And why is that a violation?

13 A. Because it violates the time period in the  
14 TDOC grievance process for a response to a  
15 grievance.

16 Q. Is it concerning that eight grievances  
17 filed during that period did not receive a response  
18 at all?

19 A. Yes.

20 Q. Then it says corrective action plan. Now,  
21 who would be involved in putting together the  
22 recommendation for the corrected action plan?

23 A. The facility leadership and the people at  
24 Trousedale.

25 Q. When you say the people at Trousedale, does

1 that include the contract monitors?

2 A. Primarily, it would be the facility's  
3 responsibility to state what the plan of corrective  
4 action would be, and they could have discussions  
5 with the contract monitors on-site. They could be  
6 involved in that, but primarily the corrective  
7 action plan, the responsibility for that lies with  
8 the vendor.

9 Q. And so I want to make sure I understand  
10 how this process works. So they come up with a  
11 corrective action plan and then do they submit that  
12 to someone at TDOC for approval?

13 A. Yeah. They submit that to the compliance  
14 section for the approval.

15 Q. Would that approval happen in writing?

16 A. Yes.

17 Q. Do you know what that document would be  
18 called?

19 A. I do not. It may be memo form, but  
20 usually the corrective action plan is stated, as  
21 well as our review of their corrective action plan  
22 for compliance.

23 Q. And do you know who has input in approving  
24 a proposed corrective action plan by CoreCivic?

25 A. I don't know that -- it would be the

1 compliance section of the Department. And when you  
2 say the approving, again, approval of the corrective  
3 action plan, you know, that's really a question I  
4 would want to talk with the IG about in relation --  
5 if approving is the right word to use there. I know  
6 the corrective action plan is submitted and we  
7 review that corrective action plan and then check  
8 for compliance with the corrective action plan, so,  
9 again, it's a little bit out of my lane on that.

10 Q. So I guess that's what I'm trying to  
11 figure out is if it's -- I think maybe it could be  
12 one or two ways or maybe a third, but I don't  
13 understand. So you say, hey, there's a violation,  
14 here's the violation that's been found, CoreCivic  
15 then says here's our proposed corrective action  
16 plan. You, as you're sitting here today, you don't  
17 know if somebody says, okay, that looks like a good  
18 plan, go forward with it and we'll monitor  
19 compliance.

20 A. No. Let me give you an example of what  
21 I'm talking about. So I can give you an example of  
22 where we would say this corrective action plan is  
23 not appropriate. Let me just give you an example.  
24 Let's say for instance we had a violation of count  
25 procedures or something like that and the corrective

1 plan submitted, you know, was not timely. Obviously  
2 we would reject that with the understanding that the  
3 corrective action plan submitted is not timely;  
4 therefore, you know, there would have to be a  
5 modification in that plan.

6 Q. Okay. And so I think what I'm taking then  
7 from your answer is that if a proposed corrective  
8 action plan is submitted by CoreCivic, TDOC has the  
9 ability to reject that proposed corrective action  
10 plan; is that right?

11 A. Yes. I believe so, yes.

12 Q. Okay. So then the next step that TDOC  
13 would take is, would you have someone whose  
14 responsibility it would be to ensure that the  
15 corrective action plan is being adhered to?

16 MR. AUMANN: Objection. You can go ahead.

17 THE WITNESS: Our compliance monitors at  
18 the facility with oversight of that corrective  
19 action plan.

20 BY MS. HERZFELD:

21 Q. Would they have to make some sort of  
22 regular reports to say, you know, hey, Trousdale  
23 has, for example, four different items that they're  
24 on a corrective action plan for and here is my  
25 periodic update as to their progress on working on



1 this corrective action plan?

2 A. Yes. The progress and the monitoring of  
3 the corrective action plan would be documented.

4 Q. Okay. And that would be by the contract  
5 monitors?

6 A. Yes. In the compliance section, yes.

7 Q. And if I wanted to know how much input  
8 TDOC has in the development of a corrective action  
9 plan, who would I ask?

10 A. That would be a conversation with the  
11 individuals in the IG's office over compliance.

12 Q. Okay. When you gave me an example before  
13 of a time when TDOC could say, hey, this plan isn't  
14 going to work because there's a timeliness issue,  
15 for example, outside of something like timeliness,  
16 would TDOC ever have input into a proposed  
17 corrective action plan at a more substantive level,  
18 like, we don't think your plan is really going to  
19 work to remedy the issue, or we think your plan  
20 needs to be a little bit more aggressive, because,  
21 you know, we don't think this is going to get to the  
22 heart of the problem as quickly as it needs to be.  
23 Does TDOC get involved more at that level?

24 A. Well, obviously, I think -- yes. We  
25 would -- if there was discussion with the contractor

1 and the -- I'm sorry, with the people on-site  
2 monitoring compliance, it's very possible there  
3 could be a discussion about a proposed corrective  
4 action plan. That's not something that would be,  
5 certainly not prohibited.

6 Q. Okay. But it's possible, right?

7 A. Yes.

8 Q. So if I really wanted to know the very  
9 specifics about corrective action plans and  
10 compliance with a contract at a particular facility,  
11 is it your testimony that the contract monitors  
12 assigned to that facility would be in the best  
13 position to provide that information?

14 A. Well, I think that the -- yes. The people  
15 who are on-site monitoring the activities at the  
16 facility could speak to the corrective actions and  
17 the adherence to a corrective action plan, yes.

18 Q. Is there anyone else that you think would,  
19 you know, in the latter that would have a better  
20 position than the contract monitors on-site to make  
21 that determination?

22 A. Well, other than, you know, people  
23 on-site, the correctional administrator who works  
24 for the State that's over those facilities, the  
25 administration at the facility, as well as the

1 people in the inspector general's office for the  
2 Department.

3 Q. And did the auditors that conduct these,  
4 are they TDOC employees?

5 A. Primarily, yes, they are. They're TDOC  
6 employees who travel that conduct these audits  
7 across the state. Let me look at the list here.  
8 Yes, these are primarily TDOC employees for the  
9 Department.

10 Q. Okay. So they are in your department,  
11 they're in TDOC?

12 A. Yes.

13 Q. Okay. Do you know what is a compliance  
14 audit preliminary report?

15 A. Can you show me a copy of one?

16 Q. I don't know that I have one. Do you know  
17 what a preliminary report is as opposed to a final?

18 A. I believe the preliminary report is the  
19 initial report that lists the items. Then there is  
20 a process of discussion and an appeal for any  
21 findings, and then we follow back up with a  
22 secondary inspection to check for corrective  
23 actions, items, and then there's a final report  
24 listed.

25 Q. Okay. So I want to make sure I

1 understand. So it sounds like they're kind of  
2 giving more of a -- that CoreCivic would be given  
3 more of an informal warning of, hey, there's an  
4 issue here, you have the opportunity to correct it  
5 before that final report were to come down?

6 A. No, I wouldn't say that. I think that  
7 would not be accurate. We have the inspection,  
8 which produces the report and the issues of  
9 noncompliance based on the findings from the audit  
10 team. If there is a disagreement about an  
11 interpretation of a policy or process, if I'm not  
12 mistaken, there is a time, and this would apply to  
13 any facility, not just CoreCivic, any correctional  
14 facility, as well as our probation and parole  
15 division, there would be an opportunity for a  
16 rebuttal regarding a finding, and then that could be  
17 adjusted.

18 Now, what I'm not for sure about is if  
19 that's in the preliminary or the final report, but,  
20 again, that's a question that the IG's office could  
21 certainly better answer than I can.

22 Q. Okay. Great. Do you know what a critical  
23 response form is?

24 A. That's a response to a critical finding at  
25 the facility.

1 Q. Okay. What is a critical finding?

2 A. Critical finding is one of those findings  
3 that has been labeled as critical by the Department  
4 as a serious violation that needs to be corrected as  
5 soon as possible.

6 Q. Okay. I'm going to hand you what is --  
7 I'm going to show you on the screen what we're going  
8 to mark as Exhibit 14. This is labeled TDOC002955.

9 (WHEREUPON, the  
10 previously-mentioned document was  
11 marked as Exhibit Number 14.)

12 BY MS. HERZFELD:

13 Q. It's dated 12/30/2020. Did I read that  
14 correctly?

15 A. That's correct.

16 Q. This looks like it's from a TDOC auditor,  
17 Zachary Pounds; is that correct?

18 A. That's correct.

19 Q. Do you know who Mr. Pounds is?

20 A. I'm somewhat familiar with Mr. Pounds,  
21 yes.

22 Q. I'm sorry, that's to Mr. Pounds, and it's  
23 from the Raymond Byrd, who was the warden at  
24 Trousdale at the time; is that right?

25 A. Yes.

1 Q. The subject says, critical response form.  
2 Yes?

3 A. Yes.

4 Q. Okay. So is this what you were talking  
5 about when we were talking about critical response  
6 from earlier?

7 A. This looks like a response from the warden  
8 to the auditor division related to a critical  
9 finding.

10 Q. Okay. So let's go down and look and see  
11 what that critical audit finding was. Do you see  
12 the subject of the critical finding?

13 A. Yes.

14 Q. What is it?

15 A. Grievance procedures.

16 Q. Okay. What does it say the issue is?

17 A. Supervisors' response not being completed  
18 within the required time frame of seven working  
19 days.

20 Q. So that would be an example of a critical  
21 finding in an audit and then this would be  
22 CoreCivic, the warden's response to that proposed  
23 corrective action?

24 A. Yes.

25 Q. Okay. And in this one it says that the

1 proposed corrective action during the January 20,  
2 2021 operations meetings and the department head  
3 meeting, the assistant warden of operations, chief  
4 of security or designee will reeducate shift  
5 supervisors and department heads on grievance  
6 procedures and the importance of timely response.  
7 All training will be documented in the meeting  
8 minutes and on a 4-2A training activity attendance  
9 roster. Did I read that correctly?

10 A. That's correct.

11 Q. Do you know if TDOC had any input into  
12 this plan of corrective action?

13 A. I do not know.

14 Q. Do you know if that is an acceptable plan  
15 of corrective action?

16 A. I would have to confer with the audit team  
17 related to the specific finding in the plan of  
18 corrective action.

19 Q. Then it looks like it goes further.  
20 Starting the week of January 4, 2021, grievance  
21 responses will be due back to the grievance  
22 coordinator within 48 hours. The grievance  
23 coordinator will notify the assistant warden of  
24 operations of any grievances that she has not  
25 received a response to within that time frame. The

1 assistant warden of operations will follow up with  
2 the responsible supervisors to ensure responses are  
3 completed and returned to the grievance coordinator  
4 promptly. Further noncompliance will result in  
5 additional training, counseling, and/or disciplinary  
6 action that's appropriate. Did I read that  
7 correctly?

8 A. Yes.

9 Q. Do you know if Trousdale has complied with  
10 its plan of corrective action regarding grievance  
11 procedures as outlined in this document?

12 A. I do not. I would have to check with the  
13 IG's office to make what determination.

14 Q. And if they had not complied with their  
15 plan of corrective action, what would happen next?

16 A. Well, if the plan of corrective action has  
17 not been followed and adhered to, then the -- there  
18 would be a noncompliance report filed and the  
19 possibility of liquidated damages could occur.

20 Q. Okay. And I wanted to find out  
21 information on where that's happened, where would I  
22 look?

23 A. The office of investigator -- I'm sorry,  
24 inspector general with the Department.

25 Q. Okay. Then in talking about something



1 like noncompliance for grievances, which we  
2 discussed earlier where we were talking about  
3 grievances, we talked about how incredibly important  
4 they are, right?

5 A. Correct.

6 Q. And that's important from a facility  
7 standpoint so you can document what's going on and  
8 make sure that you have the appropriate  
9 documentation of concerns of the prisoners; is that  
10 right?

11 A. Correct.

12 Q. That's for the protection of the facility  
13 but also for the good working order at the facility?  
14 Yes, sir?

15 A. I'm sorry, I didn't hear you.

16 Q. That is -- you know, we had discussed  
17 before that's so that the facility can continue  
18 working in good order; is that right?

19 A. Well, it's an important process just like  
20 I said before, to ensure that inmates have an avenue  
21 to express their concerns, any problems that they  
22 associate with their stay there, as well as if they  
23 observe where, you know, policy may not be followed,  
24 if they have an avenue to express their concerns and  
25 grievances to the leadership of the facility. So,

1 yes, it is important. It's critical.

2 Q. And it's important for the prisoner, too,  
3 if they're trying to get help for a particular  
4 issue, right?

5 A. Correct.

6 Q. And that would be their primary avenue to  
7 try to get help for that issue, is by going through  
8 the grievance process; is that right?

9 A. I'd say yes. The grievance process would  
10 be one avenue. There's other avenues, whether it's  
11 talking to staff or -- there's a lot of ways for  
12 inmates to express an issue or make a request, but  
13 the grievance process is certainly an important  
14 process for the inmates to use to document  
15 grievances or bring forth issues to the  
16 administration of the facility.

17 Q. And that's the formal process that's in  
18 place for them to do that?

19 A. Yes.

20 Q. So I guess my question is, when you do a  
21 plan on corrective action on something like  
22 grievances not being returned and those deadlines  
23 not being followed, and if, you know, that  
24 corrective action plan works or it doesn't, you know  
25 you just said that what you can get is liquidated

1 damages, and I guess my question is, what happens to  
2 those prisoners' grievances that weren't responded  
3 to?

4 MR. WELBORN: Object to the form.

5 MR. AUMANN: Same objection. You can  
6 answer.

7 THE WITNESS: Again, that would be a  
8 question that I would want to ask the warden and  
9 administration of that staff. First of all, why it  
10 was not being followed at the beginning, why the  
11 policy was not being adhered to, and then as far as  
12 the corrective action, assuming that it had been  
13 addressed, what procedures were in place to ensure  
14 that it does not happen going forward or that we  
15 don't have a policy violation going forward.

16 BY MS. HERZFELD:

17 Q. And I understand that from like a policy  
18 perspective, making sure that the policy is being  
19 followed or has been remedied if there was a problem  
20 in the past. But my question is very specific for  
21 the very specific grievances that were not taken  
22 care of according to policy. What is done to those  
23 individuals whose grievance were not followed or  
24 responded to?

25 A. What do you mean when you say, what is

1 done to those individuals?

2 Q. Well, so, I mean, as you know, a prisoner  
3 has to go through a grievance process in order to  
4 exhaust, to file a lawsuit in court for example,  
5 right?

6 A. Right.

7 Q. So if, you know, I'm Prisoner Jane Doe and  
8 I have filed a grievance with Trousdale, and it's  
9 one of those grievances that have been identified by  
10 this inspection report that says it wasn't responded  
11 to, what happens to Jane Doe's grievance?

12 A. Well, there should be follow-up. The  
13 facility should follow up if they know that someone  
14 filed a grievance and the process was not followed,  
15 that there should be follow-up at the facility level  
16 with that individual to address the grievance at  
17 hand or to address the issue at hand.

18 Q. Because you're trying to fix not only the  
19 systemic problem but also to correct any law in the  
20 process for an individual; is that right?

21 A. Yes. You're trying to address and  
22 evaluate the complaint or whatever the issue is that  
23 the inmate brings forward.

24 Q. And where would I find documentation of  
25 the corrective action that's taken towards each

1 inmate whose grievance wasn't processed  
2 appropriately at Trousdale in this circumstance, for  
3 example?

4 A. I don't know that the policy directly  
5 adheres to that. I would start with the warden of  
6 the facility and the leadership of the facility  
7 level to see what was done in relation to follow-up  
8 with the inmate.

9 Q. And in this circumstance, it looks like  
10 this is from Warden Byrd; is that right?

11 A. That's correct.

12 Q. Warden Byrd is no longer the warden at  
13 Trousdale?

14 A. Correct.

15 Q. Okay. Do you know if at any point TDOC  
16 would stop trying to work with CoreCivic on a  
17 noncompliance issue, like at some point, you just  
18 say forget it, we'll just take the liquidated  
19 damages and move on?

20 A. No. We would not settle for that. At the  
21 end of the day, we continue -- liquidated damages  
22 are assessed, but that in itself would never totally  
23 satisfy the issue of a noncompliance finding. We  
24 would continue to work and try to resolve or help in  
25 any way we could resolve the issue for

1 noncompliance. And we would expect the same, we  
2 would expect the issue to be resolved by the vendor.

3 Q. So with liquidated damages, where do those  
4 go?

5 A. Could you be more specific in your  
6 question? I'm sorry.

7 Q. Sure. So we've gotten to the point where  
8 you've assessed liquidated damages pursuant to the  
9 contract at CoreCivic, and that money is taken from  
10 CoreCivic back to TDOC, I'm assuming; is that right?

11 A. That money -- well, the monies are  
12 withheld from the payment to the county, so that  
13 money goes -- stays in the general fund or with the  
14 Department of Corrections.

15 Q. Okay. So the money doesn't go from one to  
16 the other and then back again, it's just you kind of  
17 take a deduction of your next payment; is that  
18 right?

19 A. Yes.

20 Q. What about any of those liquidated damages  
21 would go to help the actual prisoner whose issue  
22 might have caused the noncompliance?

23 A. What's your question? When you say what  
24 about it, what do you mean?

25 Q. I think I understand that the liquidated

1 damages are, you know, to get the contractor into  
2 compliance, that's the purpose of liquidated  
3 damages, yes?

4 A. Yes. It's a sanction that we use or part  
5 of the process where we withhold funds, but as far  
6 as turning around and providing those funds to the  
7 inmate, is that your question?

8 Q. No, it's not. I'm just trying to figure  
9 out what happens to the inmate if these policies are  
10 not being followed, the contract is not being  
11 followed, that has an impact on the inmate, right?

12 MR. WELBORN: Object to the form.

13 THE WITNESS: It could, yes, depending on  
14 the argument or the issue at hand, yes, it could  
15 have an effect on the inmate.

16 BY MS. HERZFELD:

17 Q. So I guess I'm trying to figure out what  
18 remedy an inmate would have at that point.

19 A. I think the inmate has the remedy of why  
20 we're here today. I mean, a lawsuit or legal action  
21 or the grievance process or whatever the case may  
22 be.

23 Q. Right. But then if part of the issue for  
24 noncompliance with the grievance process isn't  
25 working appropriately, doesn't that kind of put an

1 inmate in a catch 22?

2 MR. AUMANN: Objection. Form.

3 MR. WELBORN: Object to form.

4 THE WITNESS: Well, again, yes, it would  
5 in a particular incident. I think it would be  
6 difficult, it would be problematic when the process  
7 was not followed or the policy was not followed, it  
8 would be problematic. But, begin, I think we would  
9 look for a systemic issue as it relates to  
10 grievances or any other violation, and there is  
11 things you have to consider in evaluating those.  
12 But I understand your point, but, yes, it could have  
13 a negative effect on the offender and his ability to  
14 seek action, I guess.

15 BY MS. HERZFELD:

16 Q. What types of circumstances would it take  
17 for TDOC to come in and take over a facility from a  
18 contractor? At what level does it have to get to  
19 before you would consider exercising that option?

20 MR. AUMANN: Objection. Form.

21 MR. WELBORN: Object to form.

22 THE WITNESS: That's a very complicated  
23 question and consideration. That would have to be,  
24 in my opinion as commissioner and my personal  
25 opinion, I guess, professional opinion, a serious



1 systemic lack of leadership and multiple, multiple  
2 violations of life safety issues at a facility for  
3 that to happen, for us to -- for me to step in and  
4 say, I want to call a contract breach and take the  
5 necessary steps to look at taking over a  
6 correctional facility.

7 BY MS. HERZFELD:

8 Q. I mean, does TDOC really even have the  
9 ability to do that? The employees at a particular  
10 facility wouldn't be your employees, right? I mean,  
11 practically, how would one come in and take over a  
12 facility?

13 MR. AUMANN: Object to the form.

14 THE WITNESS: There's processes in place  
15 where we would have to look at a resumption of  
16 control plan where obviously I would have to be in  
17 conversations with other individuals at the  
18 governor's level, at the legislative level, within  
19 State government, with the vendor, and we would look  
20 at the process of how funds would be made available  
21 for the State of Tennessee to take over a facility  
22 and resume -- or assume the management and control  
23 of that facility and inmates. It would be very  
24 complicated.

25 BY MS. HERZFELD:

1 Q. Sounds like a pretty long process, it  
2 couldn't happen very quickly?

3 A. Well, I don't know exactly how long it  
4 would take. I think that -- you know, there's  
5 multiple people at play here. You've got the people  
6 I just mentioned along with F&A budget and others  
7 that would have to be in this discussion and the  
8 time it would be take to get agreements in place,  
9 understandings in place and written procedures in  
10 place to take over the facility. It would not  
11 happen overnight probably.

12 Q. And have you ever been involved in any  
13 conversation where anyone at the state level has  
14 indicated, you know, thought process for taking over  
15 Trousdale or any other contracted facilities in the  
16 state?

17 A. No. Other than the, you know, plans that  
18 we would have in place for the South Central  
19 facility, the facility that we own there in Clifton,  
20 business resumption plans, things like that, but,  
21 no, I have not.

22 Q. Okay. Did anybody ever mention any  
23 concerns about CoreCivic continuing to monitor the  
24 Trousdale facility after the comptroller's audit?  
25 Were you involved in any conversations about that?

1 MR. AUMANN: Objection.

2 THE WITNESS: You know, I've had --  
3 there's been complaints from some of the  
4 legislators, some concerns. I said complaints, I  
5 guess the work concerns would be a better way to  
6 describe that from some of the lawmakers, questions  
7 for me as commissioner related to staffing issues,  
8 things like that. One of the things I always try to  
9 do is look at the issues that any facility is having  
10 and compare those with what we're seeing statewide,  
11 as well as what we're seeing across the nation when  
12 it comes to particular issues. Whether that be, you  
13 know, inmate suicides or staffing shortages or  
14 mental health issues, whatever the case may be.

15 And, you know, when you look at a state  
16 like Tennessee, I know one of -- you know the first  
17 comptroller's audit that I was involved with as  
18 commissioner, the issue of staffing come up, and at  
19 the time, the State, we were -- the economy was very  
20 good. It's still very good, and it makes it hard to  
21 hire people, not just at CoreCivic, but at every  
22 state prison within Tennessee as well as in other  
23 states.

24 So you have to consider those things when  
25 you look at the issue at hand or whatever the

1 noncompliant issue may be. So all of those things  
2 have to be weighed when you're looking at issues of  
3 noncompliance.

4 MS. HERZFELD: Okay. Let's go off the  
5 record and take a five-minute break.

6 (Brief break observed.)

7 BY MS. HERZFELD:

8 Q. Okay. Back on the record. Commissioner  
9 Parker, are you familiar with the comptroller of the  
10 treasury audit for TDOC facilities?

11 A. Yes.

12 Q. What role, if any, do you have in the  
13 audits?

14 A. I have -- other than being the  
15 commissioner of the Department and as far as the  
16 audit process itself, I have very little control in  
17 regard to the audit itself.

18 Q. Do you have meetings with anyone while  
19 it's going on, or do you meet with the auditors,  
20 review papers, or you kind of get it when it's  
21 finished and then start meetings too --

22 A. Well, my team meets from time to time with  
23 the auditors from the comptroller's office, and, you  
24 know, throughout that process, depending on how long  
25 they're with us, we could be briefed maybe once or

1 twice regarding -- I don't know that I would call it  
2 briefing so much as sometimes questions, needing for  
3 them to ask questions or clarifications about  
4 certain things. But, usually, we are notified of a  
5 draft report that's sent to us once the audit is  
6 complete and the decisions are being made regarding  
7 the final report from the comptroller's office.

8 Q. And who is in charge of that process, is  
9 it the comptroller himself?

10 A. The comptroller and his auditors. He has  
11 different people over different sections of his  
12 office that oversee audits of state and local  
13 governments and others.

14 Q. And if you'll -- we'll put Exhibit 15 on  
15 the screen.

16 (WHEREUPON, the  
17 previously-mentioned document was  
18 marked as Exhibit Number 15.)

19 BY MS. HERZFELD:

20 Q. Exhibit 15, and I'll let you go ahead and  
21 take control of it. Do you recognize this document?

22 A. Yes.

23 Q. What is it?

24 A. Hold on. I'm trying to get this -- it's  
25 the performance audit. I can't get it to move. I

1 don't know if I have control of it or not. There we  
2 go.

3 Dated November 2017, comptroller's  
4 performance audit of the Department of Corrections.

5 Q. Do you know this as being the first  
6 comptroller's audit regarding Trousdale or the  
7 second comptroller's audit regarding Trousdale?

8 A. I believe this is the first audit that I  
9 remember where Trousdale was specifically mentioned  
10 in the audit.

11 Q. And you were commissioner in November of  
12 2017?

13 A. Yes.

14 Q. And you're familiar with this report?

15 A. Yes.

16 Q. If you will go with me to Page 4 of the  
17 report where it says audit highlights. There you  
18 go. That contains a list of findings. Do you see  
19 the first one right there? Says Trousdale Turner  
20 Correctional Center and Whiteville Correctional  
21 Facility managed by CoreCivic operate with fewer  
22 than approved correctional officer staff, did not  
23 have all staffing rosters, did not follow staffing  
24 pattern guidelines and one left critical post  
25 unstaffed. Did you see that?

1 A. Yes.

2 Q. Is your understanding that that was the  
3 conclusion from the -- one of the conclusions from  
4 the first audit by the comptroller?

5 A. That's correct.

6 Q. Ad then it goes on to say, shortages in  
7 correctional officer staff may have prevented two  
8 CoreCivic facilities, Trousdale Turner Correctional  
9 Center and Whiteville Correctional Facility from  
10 meeting staffing obligations, and may have limited  
11 their ability to effectively manage the inmate  
12 populations assigned to them. Did I read that  
13 correctly?

14 A. Yes.

15 Q. Correctional officer staffing was often  
16 less than operationally planned and Trousdale Turner  
17 had unstaffed critical posts on several days. Both  
18 facilities have rosters that did not match state --  
19 approved staffing patterns and both facilities were  
20 consistency short staffed. Did I read that  
21 correctly?

22 A. That's correct.

23 Q. Do you consider that to be a serious  
24 deficiency in those two facilities?

25 MR. AUMANN: Objection to form. You can

1 go ahead.

2 THE WITNESS: The deficiency stated there,  
3 yes, any time you cannot cover all critical posts,  
4 it is serious. I remember the nuances of some of  
5 these findings, and this finding in particular, that  
6 we addressed at the time of our corrective action,  
7 and -- but, yes, to answer your question, I would  
8 consider that a finding that I would consider  
9 serious, yes.

10 BY MS. HERZFELD:

11 Q. What types of problems based on your  
12 experience of over 30 years in corrections can come  
13 from not having adequate staffing in a correctional  
14 facility?

15 A. Again, having the staff available to  
16 effectively manage a facility is important, is  
17 critical. Do staffing shortages happen from time to  
18 time? Yes, they do. Are there processes in place  
19 to address staffing shortages or a vacancy? Yes.  
20 There are processes in place where you either reduce  
21 or move posts that may be identified as being a  
22 critical post and stop the activity in a particular  
23 area and move officers from one post to another to  
24 cover critical posts. That's a common practice that  
25 you would see in corrections.



1           But, you know, you want to make sure all  
2           your critical posts are covered. Obviously, when  
3           you have inmates in areas that need to be  
4           supervised, you want to make sure you have the  
5           staffing in place to supervise those offenders.

6           Q.    And that's a safety issues, because as you  
7           said before, there's, you know, violent and  
8           dangerous criminals that are being housed at  
9           facilities like Trousdale; is that right?

10           MR. AUMANN:  Object to the form.

11           MR. WELBORN:  Same objection.

12           THE WITNESS:  Yeah, there are inmates that  
13           obviously have violent tendencies at all of our  
14           facilities across the state, so, yes, it's important  
15           to have critical posts covered.

16           BY MS. HERZFELD:

17           Q.    And that's a safety issue?

18           A.    It could be, yes.

19           Q.    Do you know if CoreCivic has ever been in  
20           compliance with critical staffing requirements as  
21           Trousdale?

22           MR. AUMANN:  Objection to form.  You can  
23           go ahead.

24           MR. WELBORN:  Same objection.

25           THE WITNESS:  Yes.  I think there's been

1 times when obviously that all their critical posts  
2 were covered at the facility.

3 BY MS. HERZFELD:

4 Q. Do you know when those times were?

5 A. I don't have it written down. I do  
6 remember periods of time when the staffing at  
7 Trousdale was probably -- when you look at  
8 vacancies, was some of the lowest we had in the  
9 state, but I don't remember the specific time frame  
10 for those periods.

11 Q. Do you know if you've ever had all  
12 critical posts covered at Trousdale on a monthly  
13 basis at any time during the past three years?

14 A. I'm not sure. I would have to go back and  
15 look at compliance reports, again, with the IG's  
16 office, so I would have to look at that.

17 Q. If you had a facility like CoreCivic that  
18 was consistently unable -- CoreCivic at Trousdale,  
19 that was consistently unable to meet staffing of  
20 critical posts, would that be a significant safety  
21 concern for you as commissioner of corrections for  
22 the State?

23 A. It would be a concern with me, yes, just  
24 like it is a concern with some of my state  
25 facilities where we're having issues with the

1 staffing. If we had areas that could not be staffed  
2 or we were running short of staff, I would want to  
3 know what processes or what's being done, what  
4 issues or what things are being addressed to  
5 mitigate some of the issues that follow a shortage  
6 of staff.

7           So in other words, are you shutting down,  
8 closing particular housing units, are you  
9 temporarily postponing activities in a particular  
10 area where you do not have a staff member to cover a  
11 particular post, things like that. How those posts  
12 are being covered would be of importance to me to  
13 know what's been going on, or what kind of processes  
14 you're putting in place to help mitigate the risk.

15           Q. And what of those types of plans, if any,  
16 have been put in place at Trousdale over the past  
17 three years in response to a lack of critical post  
18 coverage?

19           A. I'm not aware of any specific ones, other  
20 than the fact that I do know in this particular  
21 audit, there was some posts that were identified as  
22 critical posts. And I'll give you an example, one  
23 had to do with one of the gate officers, I believe,  
24 and the issue was never considered that during a  
25 particular point or a particular time during a

1 24-hour period, there was no inmate movement in that  
2 area, so that officer was moved from that post to  
3 cover another post. That's an example of a  
4 situation where there was an action taken to  
5 mitigate the risk for that area or for another area  
6 where a post needed to be covered. So you shifted  
7 your population or your staffing assignments to  
8 another area to cover a critical post and this post  
9 may have been left uncovered, but you have to  
10 consider there was no inmate activity in that area  
11 at the time.

12 Same thing would apply to your sally port.  
13 Once your sally port area is closed after 4:00, it  
14 may be a critical post up until that time, but after  
15 that period of time, it's certainly appropriate to  
16 move staff from that post and use them in a  
17 different location during that work site.

18 Q. Are you saying that some critical posts  
19 aren't always critical posts?

20 A. That's correct.

21 Q. Where could I find those notes of what is  
22 sometimes, not always a critical post but sometimes  
23 a critical post? Where would I find that written  
24 down?

25 A. Usually that's identified in the staffing

1 assignment schedules and the rosters for the  
2 facility that -- I'll give you an example. Could be  
3 designated with an asterisk and it -- just like for  
4 example, the example I gave you where if you had a  
5 visitation, visitation would be considered a  
6 critical post when visitation was ongoing. If  
7 visitation is not in process on a particular day,  
8 even though visitation may be listed on a roster,  
9 it's not a critical post because you don't have  
10 visitation occurring that day.

11 So, again, those would be found with the  
12 post assignment schedules for the facilities.

13 Q. So who would make the determination that a  
14 critical post isn't really a critical post that day,  
15 who would be responsible for that?

16 A. That would be a determination made at the  
17 facility with oversight from the assistant  
18 commissioner of prisons for the Department of  
19 Corrections.

20 Q. Okay. So to use your example that  
21 visitation may be a critical post when there's  
22 visitors there, but it's not a critical post when  
23 there's not, is that not provided for in the  
24 definitions of what's a critical post under the  
25 contract?

1           A.     I'm not sure about that. I know the  
2 contract requires that the post assignments be  
3 submitted. It would also require that those posts  
4 that are critical versus non-critical be identified,  
5 and it would also -- it would include the  
6 designation of any post that might be critical when  
7 inmate activity was going on in a particular area.

8                     But, again, that's something I would have  
9 to look at or we would find with the assistant  
10 commissioner of prisons here at the Department of  
11 Corrections.

12           Q.     So the assistant commissioner of prisons  
13 in connection with somebody at the facility would  
14 make a determination to reclassify something from a  
15 non-critical post to a critical post and a critical  
16 post to a non-critical post? Do I understand you  
17 correctly?

18                     MR. WELBORN: Object to the form.

19                     MR. AUMANN: Same objection.

20                     THE WITNESS: Again, it would be  
21 identified on the staffing rosters, the staffing  
22 assignments, security staffing assignments.

23 BY MS. HERZFELD:

24           Q.     Okay. Let's move on to the second  
25 finding. See the second finding there? CoreCivic

1 staffing reports for two facilities, Trousdale  
2 Turner Correctional Center and Hardeman County  
3 Correctional Center continues numerous errors, so  
4 information about hires, terminations and vacancies  
5 may not be reliable. Did I read that correctly?

6 A. Yes.

7 Q. And we were just talking about how you're  
8 directing me to specific staffing rosters and  
9 reports about what is critical, what was filled and  
10 what was not; is not right?

11 A. Correct.

12 Q. So I guess if those are not reliable, what  
13 other things could we look at to know what posts  
14 were filled and what posts were not?

15 MR. AUMANN: Object to the form.

16 MR. AUMANN: You can go ahead.

17 THE WITNESS: Again, the staffing reports  
18 that's referenced here, I believe are the staffing  
19 reports at the facility that contained the names of  
20 officers assigned to a particular post each day. It  
21 gets really confusing because there is staffing  
22 reports and rosters that's submitted to TDOC from  
23 CoreCivic that list all of the posts. If I'm not  
24 mistaken, it's been a few years, but these staffing  
25 reports that's referenced here is a list of

1 particular posts along with individual names that  
2 were assigned on a particular date for a particular  
3 post.

4 BY MS. HERZFELD:

5 Q. So that would tell you if those posts are  
6 filled or not filled on a particular day; is that  
7 right?

8 A. That's correct.

9 Q. That would be important to know if you've  
10 got critical posts covered at a facility on a  
11 particular day, right?

12 A. Yes.

13 Q. If those posts -- if those reports aren't  
14 reliable, how can you know if they truly were  
15 covered?

16 A. It would be hard to know.

17 Q. Why is it important that you have complete  
18 and accurate reporting coming to TDOC from your  
19 contractors, like CoreCivic?

20 MR. AUMANN: Objection to form.

21 THE WITNESS: Obviously, we want accurate  
22 reports sent to where -- with the exception of  
23 having our contract monitors in place to make sure  
24 that we're getting accurate documentation and  
25 information about the operation of the facility.



1 BY MS. HERZFELD:

2 Q. Do you really know what's going on with  
3 the facility, I mean, at a TDOC level absent the  
4 reports coming from the facility?

5 A. I feel like we have a good understanding  
6 and a good report, accurate reports coming from the  
7 facility, yes. I think our contractor monitors do a  
8 good job of monitoring and, you know, addressing  
9 issues at Trousedale, as well as the other  
10 facilities.

11 Q. The contract monitors that you have at  
12 Trousedale, are they responsible for ensuring that  
13 there is any issues with religious rights, that  
14 those contract provisions are being followed?

15 A. Would you repeat that, please? I  
16 misunderstood part of what you said.

17 Q. Sure. The contract monitors that you have  
18 at Trousedale, would part of their responsibility be  
19 to ensure that the religious rights that someone has  
20 pursuant to TDOC policy are being followed?

21 A. Yeah. Their responsibility is so to have  
22 review and oversight of all TDOC policies that apply  
23 to that facility to ensure compliance.

24 Q. So that would include religion?

25 MR. AUMANN: Objection to form.

1 BY MS. HERZFELD:

2 Q. Would that include grievance?

3 A. Yes.

4 Q. Would that include critical staffing  
5 posts?

6 A. Yes.

7 Q. Would that include mandatory overtime of  
8 employees?

9 MR. AUMANN: Objection to form. You can  
10 go ahead.

11 THE WITNESS: The mandatory overtime of  
12 employees, I would say is an internal function of  
13 CoreCivic and the management of that facility. What  
14 we would be concerned about is and have oversight on  
15 is the filling of security posts and covering of  
16 critical posts.

17 BY MS. HERZFELD:

18 Q. And that would be under the purview of  
19 your contract monitors; is that right?

20 A. Yes. Yes.

21 Q. If you'll go with me now to the third  
22 finding. Says Trousdale Turner Correctional  
23 Center's management continued noncompliance with  
24 contract requirements and department policy  
25 challenges the Department's ability to effectively

1 monitor the private prison. After merely two years  
2 in operation, Trousdale Turner Correctional Center  
3 still did not comply with some of the Department of  
4 Corrections' policies and contract requirements.

5 While the Department's contract monitoring efforts  
6 regularly report to facility shortcomings, cuts in  
7 monitoring staff may reduce the Department's ability  
8 to effectively monitor key contract requirements.

9 This lack of effective monitoring has resulted in  
10 situations that may undermine the Department's  
11 ability to achieve its stated mission and could  
12 result in harm to inmates. Did I read that  
13 correctly?

14 A. You did.

15 Q. Can you tell me today if Trousdale Turner  
16 Correctional Center is in compliance with all terms  
17 of the contract?

18 MR. AUMANN: Objection to form. You can  
19 go ahead.

20 THE WITNESS: There may still be issues of  
21 noncompliance at Trousdale. As of today, again, I  
22 just think about staffing, again, issues of  
23 staffing. One of the things that we see that's a  
24 habitual problem across the state as well as in  
25 other states, so for me, I don't think I can sit

1 here and say one hundred percent that Trousdale nor  
2 could I say that any state facility is in 100  
3 compliance with every policy we have in the system.

4 BY MS. HERZFELD:

5 Q. What other areas do you know Trousdale not  
6 to be in compliance with at the present time?

7 A. I don't know. I would have to talk to the  
8 contract monitors to give you an answer on that. I  
9 just used the example of staffing as one that I know  
10 has been a persistent problem with all of our  
11 facilities as a pretty safe bet that there is issues  
12 there still with staffing.

13 Q. What is the solution to that? If you  
14 continue to say, okay, keep working on it, then you  
15 deal with liquidated damages and you say keep  
16 working on it, like, when does that end? To what  
17 end do you finally get appropriate staffing at the  
18 facility?

19 A. That's a great question, because I deal  
20 with the same issue -- I deal with the same issue at  
21 the State level. I just today announced a bonus  
22 program that provides up to \$10,000 in bonuses for  
23 people who want to come to work for the Department  
24 of Corrections. Last year, we faced, you know, the  
25 issue of COVID and the fact that -- the effect that

1 we saw with COVID, this is not -- if we just talk  
2 about staffing, it's not a problem just associated  
3 with the vendor here. We're talking about a  
4 systemic issue that you can find in any state in  
5 America with the shortage of staffing. So, you  
6 know, if I had the answer to that, I would probably  
7 be doing something other than what I'm doing.

8 But to try to answer your question the  
9 best I can, we have to continue to work on it. If  
10 there is a, you know, a secret sauce out there, I  
11 don't know what it is, but I think we have to work  
12 to make the job more attractable to a younger work  
13 force. I think we have to consider the economy in  
14 the State of Tennessee, and, you know, try to pay  
15 our officers more, and also work to help the staff  
16 address issues that's unique to the corrections  
17 environment.

18 Q. So you've mentioned bonuses in paying  
19 people more as a way to potentially get more people  
20 to work at the facility, I mean, right now, I bet  
21 you, and you tell me what you think, do you think if  
22 you paid each corrections officer \$100,000 you would  
23 have these types of vacancies that you have right  
24 now?

25 MS. HERZFELD: Objection to form. You can

1 go ahead.

2 THE WITNESS: No, I don't think so.

3 BY MS. HERZFELD:

4 Q. So if CoreCivic was paying people at  
5 Trousdale significantly more money, do you think it  
6 would be likely that those positions would be  
7 filled?

8 MR. WELBORN: Object to the form.

9 MR. AUMANN: Same objection.

10 THE WITNESS: Well, I do know there was a  
11 time when CoreCivic paid more than what we made at  
12 the state level. And I think those types of issues,  
13 I mean, yeah, it helps until something changes in  
14 the economy or the workforce, but I would also say  
15 that corrections environment is a difficult place to  
16 work. Not everyone is cut out for it. And when you  
17 consider the amount of jobs that's available in the  
18 state, it makes it very difficult to recruit and  
19 retain people to work in prisons.

20 BY MS. HERZFELD:

21 Q. Do you know anything in the contract or in  
22 TDOC policy that would prevent CoreCivic from paying  
23 people more in order to get more people to come and  
24 work at Trousdale?

25 A. No. I don't know of anything that would

1 prohibit that.

2 Q. If you will go down to the bottom of the  
3 page, there is a sentence listed under the heading,  
4 observation. Do you have it? See that? There you  
5 go.

6 It says, The Audit also discusses the  
7 following issues. The Department should annually  
8 publish the correction officer turnover rate and  
9 clearly identify which classifications are included  
10 in its annually published correction officer  
11 turnover rate. Page 18. Did I read that correctly?

12 A. Yeah.

13 Q. Do you know what they mean by "turnover  
14 rate"?

15 A. Yes. It's the turnover of our staff, the  
16 amount of turnover we are seeing in the Department  
17 of Corrections.

18 Q. Do you know if there's a floor or ceiling  
19 for turnover rate established through TDOC or  
20 through a contract?

21 A. I do not.

22 Q. Do you know who is in charge of checking  
23 to see to monitor those turnover rates?

24 A. Well, this observation, if I'm not  
25 mistaken, I think it's talking about the Tennessee

1 Department of Corrections. We track our turnover  
2 rates within our facilities of state employees, so  
3 I'm not sure this is in reference to CoreCivic, but  
4 any and all observations of tracking of data would  
5 be handled through the audit division under the IG  
6 for the Department.

7 Q. Okay. Do you know why the comptroller  
8 suggested that TDOC publish the information  
9 annually?

10 A. To make sure that we -- the public knows  
11 and the general assembly is aware of what the  
12 turnover rate is with our staff.

13 Q. Does TDOC publish that information now?

14 A. We publish that information. We have it  
15 in our annual report and Brian Hughes also tracks  
16 that information, and we report that regularly to  
17 the committees that I answer to in the general  
18 assembly, state and local government and the senate  
19 and corrections sub in the house.

20 Q. Is there a place I can go online to find  
21 it?

22 A. Might could look at our -- on our website  
23 as far as the statistical abstract for the  
24 Department of Corrections.

25 Q. When you make that report, your annual



1 report for TDOC, does that include information for  
2 the CoreCivic facilities within the state?

3 A. My annual report reflects Tennessee  
4 Department of Corrections staff, as it relates to  
5 employee interaction.

6 Q. Where could I find that information for  
7 CoreCivic-operated facilities?

8 A. I think some of the information would be  
9 found in the statistical abstract such as incident  
10 reports, things like that, but I'm not sure about  
11 the employee data.

12 Q. Do you know why TDOC doesn't require that  
13 CoreCivic provides its turnover rates in a formula  
14 that can be published?

15 A. I don't know that we don't. I'm not aware  
16 of any, but, again, that's -- those are private  
17 employees, not State employees, so I would have to  
18 look into that to give you an accurate answer to  
19 that.

20 Q. Have you ever had a conversation with  
21 anyone at CoreCivic about collecting that  
22 information and making it public as part of your  
23 report?

24 A. No.

25 Q. Why not?

1 A. I just haven't.

2 Q. Hasn't come up?

3 A. No.

4 Q. If you'll look at Page 18 -- I'm sorry,  
5 Page 12. See that very last paragraph down there,  
6 section that's in the blue box?

7 A. Yes.

8 Q. Could you read that statement for me,  
9 please?

10 A. Staffing is arguably the most critical  
11 element to safety inside our prisons and the total  
12 interaction between staff and inmates is what  
13 determines the level of safety within the facility.  
14 The American Correctional Officer Intelligence  
15 Network Impacts of Understanding.

16 Q. Do you agree with that statement?

17 A. Not in total, no.

18 Q. What part do you not agree with?

19 A. Well, where it says staffing is arguably  
20 the most critical element to safety inside our  
21 prisons. That's questionable. Although staffing is  
22 important, granted there's other things that also  
23 contribute to safety and security inside of the  
24 facility. The total interaction between staff and  
25 inmates is what determines the level of safety

1 within the facility. You know, that's -- it's a  
2 very complex environment, and to say that, you know,  
3 one issue is arguably the most critical element of  
4 safety inside our facilities, is a pretty strong  
5 statement that, again, I don't know that I would  
6 totally agree with. Although it is critical, it is  
7 important, I don't know that it would be the most  
8 important.

9 Q. Can you think of an element that would be  
10 more crucial to safety inside your prisons than  
11 staffing?

12 A. Well, you know, it all works together.  
13 Compliance of safety protocols, the covering  
14 critical posts, staffing levels would play into  
15 that, the leadership at the facility, adherence to  
16 safety regulations, fire safety regulations, things  
17 like that.

18 Q. Is any of that possible if you don't have  
19 adequate staff?

20 MR. WELBORN: Object to the form.

21 MR. AUMANN: Same objection.

22 THE WITNESS: Again, adequate staffing is  
23 an element that goes into the mixture of all the  
24 things that you have to ensure safety inside a  
25 facility. I mean, you can have every post covered,

1 you can have every post covered and have a  
2 100 percent compliance rating at any facility and  
3 still have a situation happen that people would say  
4 is unsafe or someone, you know, could get hurt or  
5 even killed. That's possible.

6 BY MS. HERZFELD:

7 Q. So as the commissioner and director -- as  
8 the commissioner of the Department of Corrections  
9 for the State of Tennessee, is it your position that  
10 there is adequate staffing at Trousdale to keep the  
11 prisoners safe?

12 MR. AUMANN: Objection to form.

13 THE WITNESS: It's my position as  
14 commissioner, yes, if I felt like that the staffing  
15 level at Trousdale created a situation where that  
16 facility was totally unsafe, then, yes, there would  
17 be other steps that I would have to follow to  
18 address that, but my position is, is that the things  
19 that's done to mitigate the risk are appropriate,  
20 yes.

21 BY MS. HERZFELD:

22 Q. And that's for the entire time that you've  
23 been commissioner, that's been your position; is  
24 that right?

25 A. Yes.

1 Q. Okay. Just a minute please.

2 (Off-the-record discussion held.)

3 BY MS. HERZFELD:

4 Q. Back on the record. I think this will be  
5 Exhibit 16.

6 (WHEREUPON, the  
7 previously-mentioned document was  
8 marked as Exhibit Number 16.)

9 BY MS. HERZFELD:

10 Q. Mr. Parker, if you take a look at this. I  
11 think it starts at the top, says, Location:  
12 Trousdale Turner Correctional Center, to Brandon  
13 Bellar, Trousdale County attorney from Jon Walton,  
14 TDOC contract monitor of compliance. Do you see  
15 this document?

16 A. I do.

17 Q. It's dated February 25, 2021; do you see  
18 that?

19 A. Correct.

20 Q. It says the audit period for monthly  
21 staffing December 1st, 2020 to December 31st, 2020.  
22 Quarterly items October 1, 2020 through  
23 December 31st, 2020; do you see that?

24 A. Correct. Yes.

25 Q. TDOC employees making observations: CMC

1 Jon Walton. Do you know what CMC stands for?

2 A. Contract monitoring and compliance, I'm  
3 assuming.

4 Q. Do you know Jon Walton to be one of the  
5 contract monitors at Trousdale?

6 A. You know, I don't know him personally, but  
7 I'm assuming that's -- I have no reason to doubt  
8 that's who it is.

9 Q. Have you seen this report before?

10 A. I'm sorry, was that a question?

11 Q. Yes, sir. Have you seen this report  
12 before?

13 A. I may have. It's possible.

14 Q. Take a look at this report. Looks like  
15 he's reporting some noncompliance issues. We'll go  
16 past a bunch of them, and get to noncompliance  
17 number 3. See where we're at on the screen?

18 A. I do.

19 Q. Noncompliance Number 3, Applicable  
20 Monitoring Instrument: Staffing item 2b Essential.

21 Check every daily shift roster for all  
22 shifts for the previous month. Verify that all  
23 critical posts are staffed as required. Did I read  
24 that correctly?

25 A. Yes.

1 Q. Then it says, Noncompliance Issue. Would  
2 you read that for me, please, sir?

3 A. Noncompliance Issue: All critical posts  
4 shall be staffed as required; however, multiple  
5 critical posts were not covered during the  
6 monitoring period for the month of December. There  
7 were 31 days in the month of December, which the  
8 shift rosters reflected 733 critical posts were not  
9 filled on time or were left vacant during the  
10 security shifts.

11 Q. That's 733 critical posts that were  
12 problematic during this period of time. Does that  
13 concern you, sir?

14 A. Yes, that's --

15 MR. AUMANN: Object to form. You can go  
16 ahead.

17 THE WITNESS: Yes, that is concerning.  
18 BY MS. HERZFELD:

19 Q. Do you think that could cause a safety  
20 issue at the facility, sir?

21 A. It could, yes.

22 Q. Do you think that's a very high number of  
23 unfilled or improperly filled critical posts for a  
24 facility during a 31-day period?

25 MR. AUMANN: Objection to form.

1 THE WITNESS: That seems like a high  
2 number, yes.

3 BY MS. HERZFELD:

4 Q. Do you know if there were any violent  
5 incidents that happened at Trousdale during the  
6 month of December of this past year?

7 A. I would have to go back and look to  
8 verify, but I'm not sure at this point in time, but  
9 I would have go back and verify.

10 Q. Do you know of a single month that there's  
11 not been a violent incident at Trousdale, sir?

12 A. Again, I would have to go back and look at  
13 incident reports to give you an accurate answer to  
14 that.

15 Q. Looking at this noncompliance report where  
16 there's 733 critical posts that were not filled on  
17 time or were left vacant during the security shifts,  
18 is it still your testimony that Trousdale is  
19 adequately staffed to ensure the safety of the  
20 prisoners?

21 MR. AUMANN: Objection to form. You can  
22 go ahead.

23 THE WITNESS: So, again, I would say that  
24 obviously 733 critical posts not being filled is an  
25 issue. It's a concern to me as commissioner of the



1 Department. Again, I would want to know the details  
2 of these posts and when they were not filled and  
3 what activities were going on at the time, and were  
4 there any additional procedures taken to ensure the  
5 safety of the area where these posts were not  
6 filled. So there is other information I would want  
7 to know about this.

8 BY MS. HERZFELD:

9 Q. Just want to make sure that I understand  
10 your testimony. We know that there were the TDOC  
11 contract monitors that -- that there were 733  
12 critical posts that were not filled on time or left  
13 vacant during the security shifts during a 31-day  
14 period of time in December. And it's your testimony  
15 that that does not create a safety issue at  
16 Trousdale during the month of December?

17 MR. AUMANN: Objection. Form.

18 MS. POLLY: Joe, I see you're objecting,  
19 but you're muted.

20 MR. WELBORN: Object to form.

21 THE WITNESS: Obviously, again, it's  
22 concerning to me to make a statement that a facility  
23 is unsafe, again, I would want to know more details  
24 about the critical posts, where they were located,  
25 what other situations or what other actions were

1 taken to mitigate the risk of a critical post not  
2 being filled before I was to give an answer for that  
3 question.

4 BY MS. HERZFELD:

5 Q. Okay. So then below that report is a  
6 chart of the various posts. Does that give you the  
7 type of information that you're looking for, sir?

8 A. Again, I would want to know the post, what  
9 activity was going on at what particular time the  
10 post was not covered. I'm assuming that these posts  
11 are listed in shifts, so the time the shift started  
12 to the time the shift ended. I would want to know  
13 if they were left unattended for the entire shift or  
14 for -- you know, if you had an officer that was one  
15 minute late arriving to a post, those are some of  
16 the things I would want to know.

17 Q. Well, sir, I'm wondering what it is you  
18 did as the commissioner of the Department of  
19 Corrections in response to this report in December.  
20 It's now April.

21 MR. AUMANN: Objection to form.

22 THE WITNESS: Repeat your question,  
23 please.

24 BY MS. HERZFELD:

25 Q. Sure. It's now April, would you agree?

1 A. Yes.

2 Q. April 2021?

3 A. Correct.

4 Q. And this report is for December of 2020,  
5 so that's just about three or four months ago; is  
6 that right?

7 A. That's correct.

8 Q. So since this report came out with 733  
9 critical posts being unfilled or inappropriately  
10 filled for some period of time, what did you do in  
11 response to this report?

12 MR. AUMANN: Objection to form.

13 THE WITNESS: I would again have to check  
14 with the IG's office to see what kind of corrective  
15 action plan was put in place and what kind of action  
16 we took as a Department in relation to the  
17 corrective action plan, whether it was or was not  
18 followed.

19 BY MS. HERZFELD:

20 Q. Keep scrolling down for me. You have  
21 control. You can take a look at the entire report  
22 and tell me what was done in response to those 733  
23 unfilled critical posts, which I think are all  
24 detailed in this report.

25 A. Well, let me say again, this report that

1 I'm looking at, I haven't reviewed previously.  
2 Again, I would find that with my IG's office. I  
3 would need to talk to the IG before I -- you know,  
4 to answer your question appropriately.

5 Q. Sir, do you think it's concerning that  
6 you're the head of Department of Corrections and  
7 your staff knew that there was an issue at Trousdale  
8 where there were 733 critical posts unfilled or  
9 inappropriately filled in December and that wasn't  
10 brought to your attention?

11 MR. WELBORN: Object to the form.

12 MR. AUMANN: Objection to form.

13 THE WITNESS: Well, again, bringing it to  
14 my attention would be through the IG's office. I  
15 would be very concerned if the inspector general and  
16 his staff were not made aware of it. I'm not made  
17 aware of every single incident or finding that the  
18 compliance section may find in a facility.

19 BY MS. HERZFELD:

20 Q. So you don't -- I want to understand this.  
21 At what level would something have to be from an  
22 understaffing perspective that it would merit  
23 attention at your level, sir?

24 MR. AUMANN: Objection to form.

25 THE WITNESS: I think it would be a

1 staffing issue where there were major disruptions at  
2 a facility that caused a -- some type of issue at  
3 the facility on a particular day that would not be  
4 handled at the assistant commissioner level or the  
5 inspector general's level for the Department.

6 BY MS. HERZFELD:

7 Q. What about homicide, sir, if there were  
8 homicides at that facility in December and also a  
9 shortage of critical staffing posts at 733, is that  
10 something that would be brought to your attention?

11 A. I get notified of homicides within the  
12 Department, but not always the issue of certain  
13 posts not being filled on a particular day or during  
14 a particular period.

15 Q. Do you think there could be a correlation  
16 of violence at the facility in December of 2020 and  
17 a lack of coverage of critical posts?

18 MR. WELBORN: Object to form.

19 MR. AUMANN: Objection to form.

20 THE WITNESS: Well, I don't know. It's  
21 possible. There could be a correlation. That  
22 would, you know, obviously take further study into  
23 that.

24 BY MS. HERZFELD:

25 Q. Sir, when I've asked you questions about

1 this report, you said you need more information. I  
2 guess my question is, does that mean your office  
3 doesn't include all the information necessary to  
4 evaluate a particular situation within the report  
5 itself?

6 A. No. What I would say is I would want to  
7 have a chance to really thoroughly look at this  
8 report and study it and in conversation with my IG  
9 and the staff that did the inspection.

10 Q. I guess my question is, why haven't you  
11 read it before now?

12 MR. AUMANN: Object to the form.

13 THE WITNESS: Again, the staff that works  
14 for the IG handles this along with the assistant  
15 commissioner of prisons. There has not -- it has  
16 not been brought to my attention, the issue of 733  
17 criminal posts not being filled during this time  
18 period.

19 BY MS. HERZFELD:

20 Q. Do you think that should have been brought  
21 to your attention, sir?

22 A. Well, again, it depends on the  
23 circumstances surrounding these 733 positions, when  
24 they were found not filled, what were the  
25 circumstances surrounding those 733 occurrences, all

1 that has to be considered.

2 Q. I think all that information is in the  
3 report, sir?

4 MR. AUMANN: Object to form.

5 THE WITNESS: Like I said --

6 MR. WELBORN: Same objection.

7 THE WITNESS: -- I haven't reviewed it.

8 BY MS. HERZFELD:

9 Q. You can take your time and review the  
10 report right now, if you'd like.

11 A. I need time to study the report and talk  
12 to my staff about it.

13 Q. Okay. At what level of unfilled critical  
14 positions would it merit just based on number,  
15 number alone, without having to do more information,  
16 that you think that would merit being brought to  
17 your attention?

18 MR. AUMANN: Object to form. You can go  
19 ahead.

20 THE WITNESS: I don't know that there's a  
21 number. Again, there is other things that have to  
22 be considered in considering what you're talking  
23 about, and I've already explained that.

24 BY MS. HERZFELD:

25 Q. Do you know how many stabbings there were

1 at Trousdale in December?

2 A. No, I do not.

3 Q. Do you know how many inmate-on-inmate  
4 assaults there were in December?

5 A. No, I do not.

6 Q. Do you know how many sexual assaults there  
7 were in December?

8 A. No, I do not.

9 Q. Who would be responsible for monitoring  
10 that from TDOC's perspective?

11 A. The contract monitors there at the  
12 facility along with the inspector general and the  
13 assistant commissioner of prisons for the  
14 Department.

15 Q. Who is responsible for ensuring that the  
16 plan of corrective action that is identified in this  
17 document is actually being followed?

18 A. Again, the contract monitors in compliance  
19 with the assistant commissioner of prisons that  
20 works for the Department of Corrections.

21 Q. But you wouldn't have any personal  
22 responsibility for that?

23 A. Absolutely. I'm the commissioner of the  
24 Department.

25 Q. So you're responsible for what your folks



1 do?

2 A. Yes.

3 Q. Okay. Do you know how many inmate on  
4 officer incidents there were in December of 2020?

5 A. At Trousdale?

6 Q. Yes, sir.

7 A. No, I do not.

8 Q. Do you know how many fights there were  
9 between gang members or various STG's (phonetic)  
10 there were in 2020?

11 A. I do not.

12 Q. Do you know how many issues there were  
13 between the Vice Lords and the Bloods or the Crips  
14 at Trousdale during December of 2020?

15 A. I do not.

16 Q. Would you want to be housed in a facility  
17 that didn't have 733 critical posts manned at all  
18 times, sir?

19 MR. AUMANN: Objection to form.

20 THE WITNESS: I wouldn't want to be housed  
21 in any facility in TDOC or in a CoreCivic facility.  
22 Obviously, that's not somewhere I'd want to be.

23 MS. HERZFELD: I don't think I have  
24 anymore questions. That's my examination of the  
25 witness. Thank you.

1 MR. WELBORN: Let's take a break real  
2 quick.

3 (Brief break observed.)

4 EXAMINATION BY MR. WELBORN:

5 Q. Commissioner Parker, my name is Joe  
6 Welborn. We met before, but I represent CoreCivic  
7 along with my law partner, Erin Polly. I've got a  
8 few questions for you. I'm not going to be that  
9 long, so I hope you don't think you're going to be  
10 here for a couple more hours, at least with me.

11 I want to get a little more on your  
12 background. I got that you were warden at some  
13 point of Northwest Correctional Facility and the  
14 West Tennessee State Penitentiary; is that right?

15 A. That's correct.

16 Q. If you can, kind of give me a -- I know  
17 you started in corrections when you were 19, give me  
18 kind of the levels you went through, how you  
19 progressed position to position until you became  
20 warden.

21 A. I started in 1983 in -- I think it was  
22 June of 1983, as correctional officer. I had about  
23 three or four years as a correctional officer, was  
24 promoted to correction corporal, stayed in that  
25 position for a few years, promoted to correctional

1 sergeant, correctional lieutenant, correctional  
2 captain at two facilities there in west Tennessee at  
3 Lake County Regional, Northwest Correctional  
4 Complex. I was promoted to assistant warden of  
5 security at the -- or assistant warden of operations  
6 at West Tennessee High Security in Lauderdale  
7 County, and then promoted to deputy warden at  
8 Northwest Correctional Complex, promoted to warden  
9 there at the facility at Northwest, and then  
10 eventually served as warden at West Tennessee State  
11 penitentiary for two terms, and then promoted to  
12 correctional administrator over the west region, and  
13 then assistant commissioner of prisons for the  
14 Department of Corrections, and eventually  
15 commissioner.

16 Q. Okay. It sounded like you actually worked  
17 on the staff in, is it three different facilities?

18 A. That's correct. I -- well, actually, two  
19 facilities at different times had different names.

20 Q. Okay. And then as the -- I forgot what  
21 you called it, the correctional administrator over  
22 the West Regional Facilities, would it be fair to  
23 say that you were in those facilities quite often?

24 A. Yes.

25 Q. Across all of west Tennessee?

1 A. Correct.

2 Q. And in your position as -- and forgive me  
3 if I have this wrong, the assistant commissioner of  
4 prisons, would it fair to say that you were in  
5 various prisons across the whole state in that  
6 position?

7 A. That's correct.

8 Q. And I know you talked about this, but I  
9 want to talk about it in little bit more detail.  
10 You talked about staffing being a challenge in all  
11 facilities, in this state and across the country; is  
12 that correct?

13 A. Yes, that's correct.

14 Q. When you were working on staff at the two  
15 facilities in west Tennessee, did you guys  
16 constantly have a challenge of keeping people --  
17 enough staff hired?

18 A. Yes. There were periods of time even  
19 back, you know, in the '90's, early 2000's, that we  
20 saw that the challenge of hiring staff really, you  
21 had positive correlation there with the economy  
22 really. I mean, if you had a strong economy --  
23 well, I guess it would be a negative correlation.  
24 Strong economy, you would have very difficult times  
25 filling positions. If you had an economy that went

1 south and jobs were hard to find, we could fill  
2 positions in corrections, yes.

3 Q. Would you have instances where just on a  
4 day-to-day basis somebody -- people just wouldn't  
5 show up to work and you had to figure out how to  
6 make things work, short staffed?

7 A. Yes. We -- that was a common occurrence  
8 as a shift commander. You know, you start with a  
9 roster of people who were assigned to work and if  
10 people didn't show up, you ended up having to  
11 require people to work overtime or mandating they  
12 work overtime. Or it may require you to, you know,  
13 close a particular activity for a particular day to  
14 ensure that you have the appropriate staffing for  
15 that eight-hour shift.

16 Q. Did you have instances where you would  
17 have to, not only close like let's say rec or  
18 whatever, visitation or whatever it may be, but  
19 where you might have to keep the prisoners in their  
20 cell, the inmates in their cell for any period of  
21 time when you were short staffed?

22 A. You know, that -- again, that's one of the  
23 things that you would do to mitigate risk; although  
24 I would say that it happens, it's not the best  
25 thing, because you want to avoid locking inmates

1 down for any long periods of time. But in some  
2 cases, that's required if the staffing is not  
3 available.

4 Q. That's not ideal, it's not unusual, that  
5 that might have to occur; is that fair?

6 A. Yes, it happens.

7 Q. And, you know, we're talking -- I'm  
8 familiar with prisons a little bit. You're way more  
9 familiar with prisons than I am, but because this  
10 may be seen by a jury, jurors may not be familiar  
11 with how prisons are set up, for example, but you've  
12 got cells, individual cells that may house two  
13 inmates or more, right?

14 MS. HERZFELD: Object to the form.

15 THE WITNESS: Right.

16 BY MR. WELBORN:

17 Q. And in a lot of instances, those will be  
18 placed in a pod where you have a day or an activity  
19 room; is that accurate?

20 MS. HERZFELD: Object to the form.

21 BY MR. WELBORN:

22 Q. Go ahead.

23 A. That's correct.

24 Q. So when we're talking about ideally, you  
25 have inmates out in the day room or activity room so

1 they can move about during the day, and at night,  
2 they go into their cells. Is that kind of how it  
3 works?

4 A. Correct. Most facilities have an activity  
5 roster that there's activities or things, programs  
6 that go on certain times of the day. Usually  
7 there's a schedule that's followed, yes.

8 Q. So having dealt with staffing issues for  
9 38 years in corrections, did Trousdale have those  
10 same challenges?

11 A. Well, the staffing issues that we see at  
12 Trousdale as compared to one of my facilities in  
13 west Tennessee are similar. You know, we have a  
14 significant amount of vacancies at one of our  
15 facilities that houses medium custody inmates in  
16 west Tennessee and that's -- it's significant. You  
17 know, I said earlier, it's a challenge. It's a  
18 challenge I wish we didn't have to face in  
19 corrections. It's a wicked problem really. There's  
20 no easy answer, there's no obvious answer, but one  
21 of the things we know that we have to do at the  
22 state level is to try to be competitive in the job  
23 market. That's one of the reasons, you know, just  
24 today, we announced these bonuses that we're putting  
25 in place to try to hire staff to fill these

1 positions.

2           So it seems to be an ongoing challenge,  
3 certainly in the last few years that I can remember  
4 in corrections. One of the most significant  
5 challenges that we face.

6           Q. And in addition to the economy and the job  
7 market, there are other reasons why it's challenging  
8 to keep a full staff; is that right?

9           A. Yes. Just the nature of corrections  
10 environment in itself, it's very stressful and it's  
11 a challenging work environment, to say the least.

12          Q. Are you familiar at all with the steps  
13 that CoreCivic took at Trousdale to increase its  
14 hiring levels?

15          A. Not personally. Those are issues that the  
16 IG's office would be more familiar with than I  
17 would. I know at one time, there was additional  
18 wages or additional pay offered. I know that there  
19 was staff from other areas brought in to help  
20 supplement vacancies there or fill vacancies, but  
21 the details of those would, you know, be with the  
22 compliance team and the IG's office.

23          Q. Fair enough. You know, I want to talk  
24 about the religious issues that were brought up, but  
25 before I do that, is that -- I want to go over a few



1 questions about the contract. As I understand it,  
2 TDOC contracts directly with Trousdale County, and  
3 then Trousdale County subcontracts with CoreCivic  
4 with that facility; is that right?

5 A. That's correct.

6 Q. And it's my understanding from looking at  
7 the contract that TDOC has with Trousdale County,  
8 with respect to TDOC policies that are applicable to  
9 that facility, they are enumerated in the contract.  
10 Do you agree with that?

11 A. I'm sorry. You broke up. Would you  
12 repeat that?

13 Q. Yeah. And it may be on my end, I'm sorry,  
14 but it's my understanding from looking at the  
15 contract between TDOC and Trousdale County that with  
16 respect to the TDOC policies that are applicable to  
17 the Trousdale facility, those are enumerated in the  
18 contract?

19 A. I think that's correct, yes.

20 Q. So while TDOC has a lot of policies, they  
21 may not all be applicable to a particular facility,  
22 they're enumerated in the contract; is that  
23 accurate?

24 A. I believe that's accurate, yes. Again,  
25 that's something that I would want to confer with

1 IG's office, but I believe that's correct. I am  
2 familiar that there's some policies that the vendor  
3 would not necessarily be required to adhere to.

4 Q. Just with I think the first exhibit, and I  
5 didn't keep up with the numbers, that's more my  
6 fault, but you were asked about a policy, 116.08,  
7 and I think it dealt with religious meals. Do you  
8 know whether that is a TDOC policy that applies at  
9 Trousdale per the contract?

10 A. I do not.

11 Q. The interesting thing here is that we have  
12 been in this deposition since 10:00 this morning, so  
13 about a little over six hours, and you were asked  
14 very little about the plaintiff in this case,  
15 Mr. Pleasant-Bey. And I know you don't know him,  
16 but you were asked questions about -- general  
17 questions about religious issues; do you recall  
18 that?

19 MS. HERZFELD: Object to the form.

20 BY MR. WELBORN:

21 Q. What you can buy, what you can have and  
22 those type of things.

23 MS. HERZFELD: Object to the form.

24 BY MR. WELBORN:

25 Q. Do you remember those questions?

1 MS. HERZFELD: Object to the form.

2 THE WITNESS: Yes.

3 BY MR. WELBORN:

4 Q. Again, I know you don't know Mr.  
5 Pleasant-Bey, but if I told you that he's had a  
6 Koran, hope I'm saying that right, since he's been  
7 there, his own personal Koran, he's had access to  
8 one in the law library, has been able to buy one  
9 from Union Supply for the last several years, would  
10 that comply with TDOC policy?

11 MS. HERZFELD: Object to the form.

12 THE WITNESS: Yes, it would.

13 BY MR. WELBORN:

14 Q. If I were to tell you he wears, on a daily  
15 basis, a Kufi, he can buy prayer beads, he can buy  
16 prayer oil, he prays when he wants to, he has a  
17 prayer rug, would that comply with TDOC policy?

18 MS. HERZFELD: Object to the form.

19 THE WITNESS: Yes.

20 BY MR. WELBORN:

21 Q. If I was to tell you that he goes to  
22 Islamic services on a weekly basis, would that  
23 comply with TDOC policy?

24 A. Yes.

25 Q. With respect to the socks you were asked

1 about, the leather socks, in going through the  
2 documents, did you see in there that that was taken,  
3 I think to the TDOC, and the TDOC either agreed or  
4 signed off on that being a security issue?

5 MS. HERZFELD: Object to the form.

6 THE WITNESS: I didn't see that in the  
7 documentation, no.

8 BY MR. WELBORN:

9 Q. Can you understand or do you believe that  
10 could pose a security issue, leather socks?

11 A. The issue of leather, it would be the same  
12 issue with leather gloves, leather socks. Anything  
13 that you could put on your hands or your arms that  
14 you could fashion to put -- and still have movement  
15 of your hands, and the main threat there is being  
16 able to use it to facilitate some type of an escape  
17 or assault dealing with razor wire or things like  
18 that. That's one of the reasons we would not allow  
19 inmates to have leather gloves.

20 I read somewhere about, you know, a  
21 leather tennis shoe or that was in the policy where  
22 we allowed inmates to have tennis shoes of leather.  
23 Obviously a tennis shoe on your hand is not as  
24 pliable and wouldn't be able to be used in the same  
25 manner as a sock that would fit over your hand, from

1 my experience as being a correctional officer and in  
2 the ranks of security and supervision, that in  
3 itself would be a concern. I could understand that.

4 Q. And if the administrators from CoreCivic  
5 at the facility determined that was a security risk  
6 and folks that work under you at TDOC consider that  
7 a security risk, would you believe that's a  
8 reasonable determination?

9 A. Yeah. I mean, I would -- again, I would  
10 want to look at the documentation and the arguments  
11 for and against it, but I could -- knowing what I  
12 know and what I've heard, it doesn't sound  
13 unreasonable to me.

14 Q. You were asked a lot of questions about  
15 staffing and safety and whether you consider  
16 Trousdale safe. Do you remember those questions?

17 A. Yes.

18 Q. Now, again, get back to Mr. Pleasant-Bey,  
19 if I was to tell you since he's been at this  
20 facility, I believe since April of 2018, that he,  
21 other than one run-in with an inmate that resulted  
22 in no significant injury, he hasn't been hurt,  
23 injured in any way. With respect to safety as to  
24 him, would you think he's safe at this facility as  
25 far as you can tell?

1 MS. HERZFELD: Object to the form.

2 THE WITNESS: Well, again, yeah, it would  
3 appear so. In regards to a particular inmate, yes,  
4 but just like I answered before, I would certainly  
5 want to look at where if there was multiple  
6 vacancies, it would be relevant for me to consider  
7 the overall effect of that on a particular housing  
8 unit or an area, so I would also add that to your  
9 question. It would be very relevant, where he lives  
10 and making sure that we have adequate staffing for a  
11 particular unit.

12 BY MR. WELBORN:

13 Q. You were asked questions about grievances  
14 and the noncompliance reports about grievances, and  
15 I may be off on these numbers, I may have them  
16 backwards because I'm not looking at the document  
17 right now, but it said something like there were  
18 five grievances during some period of time that were  
19 not responded to and eight were late or maybe I have  
20 the numbers turned around. Do you remember those  
21 questions?

22 A. Yes.

23 Q. And that covered a few months' period of  
24 time as I understand it; is that right?

25 A. I believe that's correct.

1           Q.     So while -- based on your experience, and  
2 I know you haven't been gone and looked at the  
3 grievance logs with respect to this facility, but  
4 would it be fair to say that over a two, three,  
5 four-month period, there could be hundreds of  
6 grievances filed at a facility?

7           A.     You know, well there could be, depending  
8 on the facility, depending on the inmate population,  
9 depending on the situation at any particular  
10 facility, there could be multiple grievances filed  
11 during a period of time, yes. That's fair.

12          Q.     Do inmates ask for things a lot, based on  
13 your experience?

14               MS. HERZFELD: Object to the form.

15               THE WITNESS: So, yeah, I mean, it's not  
16 uncommon for inmates to make requests.

17 BY MR. WELBORN:

18          Q.     And it's pretty common for them to file  
19 grievances if those requests aren't met, correct?

20          A.     I think that's one of the avenues they  
21 have that you see in corrections, that many times  
22 inmates will file grievances when they're not  
23 satisfied with an answer or when they may be denied  
24 a particular issue. That's common, I would say.

25          Q.     So with respect at least to the

1 noncompliance report we went over with respect to  
2 the grievances, while there were five to eight,  
3 let's just say 13 in this instance, there could be  
4 many more that were where the policy was actually  
5 followed, there were timely responses and everything  
6 was done the way it should have been done.

7 MS. HERZFELD: Object to the form.

8 THE WITNESS: Could have been, yes.

9 BY MR. WELBORN:

10 Q. I think that's all I've got. Thanks.  
11 Nice to meet you.

12 A. Nice to meet you.

13 MR. AUMANN: I have a couple of quick  
14 follow-up questions, Mr. Parker.

15 EXAMINATION BY MR. AUMANN:

16 Q. Very early in the deposition, you were  
17 asked how long you met with myself and my cocounsel  
18 in preparation for the deposition. I think you said  
19 30 to 40 minutes; do you remember that?

20 A. Yes.

21 Q. Could -- from your recollection, could it  
22 actually have been closer to two and a half to three  
23 hours?

24 A. I guess it could have. You know my day  
25 usually flies by pretty quick. I don't -- it's



1 possible. It's possible.

2 Q. Maybe it was just that it felt like time  
3 just passed talking with me.

4 A. Well, it certainly felt like time passed  
5 quicker with you than it has today.

6 Q. Understandable. Just a couple of other  
7 quick questions, Mr. Parker. I want to share with  
8 you on the screen, this is -- I think I have it  
9 right. Let's see. Inmate grievance procedures  
10 document, which I think is Exhibit 12. If I'm wrong  
11 about that, please feel free to correct me.

12 Okay. TDOC grievance procedure document.  
13 Mr. Parker, do you remember being asked questions  
14 about that?

15 A. I do.

16 Q. And I think you were asked questions as to  
17 whether the inmate grievance procedures document  
18 provides for an appeal process for those grievances  
19 that have been deemed inappropriate or  
20 non-grievable. Do you remember that discussion?

21 A. Yes.

22 Q. So I'm going to let you take control, if  
23 you can.

24 A. For some reason it's not allowing me to  
25 move.

1           Q.     That's because I have not gotten to where  
2 I can take control of it. Here we go. You know  
3 what, I'm just going to go ahead and take the bull  
4 by the horns and lead you. So I'm going to direct  
5 your attention to Page 7. See where it says first  
6 level of review?

7           A.     No. The document that I'm looking has not  
8 moved. It looks like it's the inmate personal  
9 property document.

10          Q.     Oh. Let's see. I'm wondering if -- well,  
11 this is embarrassing.

12               MS. HERZFELD: Tom, it happens to the best  
13 of us.

14               MR. AUMANN: I have in front of me the  
15 inmate procedures document. But you all are seeing  
16 something different? Okay.

17               MS. HERZFELD: I am not tech savvy enough  
18 to try to help you figure it out. I can barely even  
19 handle doing this on my own side.

20               MR. AUMANN: All right. I have it on my  
21 other monitor. That's why. I think we'll get this  
22 now.

23               Okay. Now, you seeing a different  
24 document, the inmate personal property memo? Is  
25 that the one on the screen for you guys?

1           A.     We're seeing, not the memo, but the  
2 policy.

3           Q.     Okay.

4           MR. AUMANN:   Can we just go off the record  
5 for a minute while I get this set up?

6                   (Off-the-record discussion held.)

7 BY MR. AUMANN:

8           Q.     Do you see the grievance -- extension of  
9 grievances, First Level of Review?

10          A.     Yes.

11          Q.     All right.   Okay.   So, Commissioner  
12 Parker -- are we back on the record now?

13                  All right.   Commissioner Parker, looking  
14 at this document, what I believe is Exhibit 12,  
15 Inmate Grievance Procedures, I'm going to refer you  
16 to Page 7 of the document where it says, First Level  
17 of Review.

18          A.     Yes.

19          Q.     This is discussing the first level of  
20 review for grievances in general; is that correct?

21          A.     That's correct.

22          Q.     And actually, I should say all  
23 grievances -- first paragraph begins, All grievances  
24 with the exception of those alleging Title VI  
25 violations.

1 A. Correct.

2 Q. So if we go down to Page 8, which is still  
3 under the First level Of Review category, you see  
4 the third paragraph down, it says -- it starts with,  
5 Matters deemed to be inappropriate?

6 A. Yes.

7 Q. Okay. And that sentence says, Matters  
8 deemed to be inappropriate to the grievance process,  
9 an abuse of procedure, or non-grievable at level I  
10 may be appealed by inmates; do you see that?

11 A. Yes, I do.

12 Q. Okay. And it continues, Such grievances  
13 being forwarded to Level III should include legible  
14 copies of the signed response of the supervisor of  
15 the employee or area that is the subject of the  
16 grievance, if applicable, and should cite the number  
17 and date of the previous grievance, if it has been  
18 appealed to Level III, or a copy of the previous  
19 grievance if it was not appealed to Level III. Do  
20 you see that?

21 A. Yes.

22 Q. Then it says, The assistant commissioner  
23 of prisons office shall then make a final response  
24 and return the grievance to the chairperson for  
25 normal processing, if grievable, or for logging and

1 return to the grievant if non-grievable. Do you see  
2 that?

3 A. I do.

4 Q. Okay. And then, Copies of all grievances  
5 deemed inappropriate shall be kept on file at the  
6 institution. Do you see that?

7 A. I do.

8 Q. Okay. So does that discussion inform you  
9 as to whether there is a process for inappropriate  
10 or non-grievable -- or grievances deemed  
11 inappropriate or non-grievable, that it is subject  
12 to an appeal process?

13 A. Yes, it does.

14 Q. Okay. All right.

15 MR. AUMANN: That's all the questions that  
16 I have.

17 MS. HERZFELD: I don't have any  
18 follow-ups. You're free to go.

19 FURTHER THIS DEPONENT SAITH NOT  
20  
21  
22  
23  
24  
25

## REPORTER'S CERTIFICATION

STATE OF TENNESSEE       )  
COUNTY OF DAVIDSON       )

I, Janie W. Garland, LCR#111, licensed court reporter, in and for the State of Tennessee do hereby certify that the above deposition was reported by me via Zoom and that the foregoing pages of the transcript is a true and accurate record to the best of my knowledge, skills, and ability.

I further certify that I am not related to nor an employee of counsel or any of the parties to the action, nor am I in any way financially interested in the outcome of this case.

I further certify that I am duly licensed by the Tennessee Board of Court Reporting as a Licensed Court Reporter as evidenced by the LCR number following my name below.

\_\_\_\_\_  
Janie W. Garland, LCR#111

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